

City and County of San Francisco
Planning Department

235 Second Street Williams Sonoma Mixed Use Development

DRAFT ENVIRONMENTAL IMPACT REPORT

1999.176E

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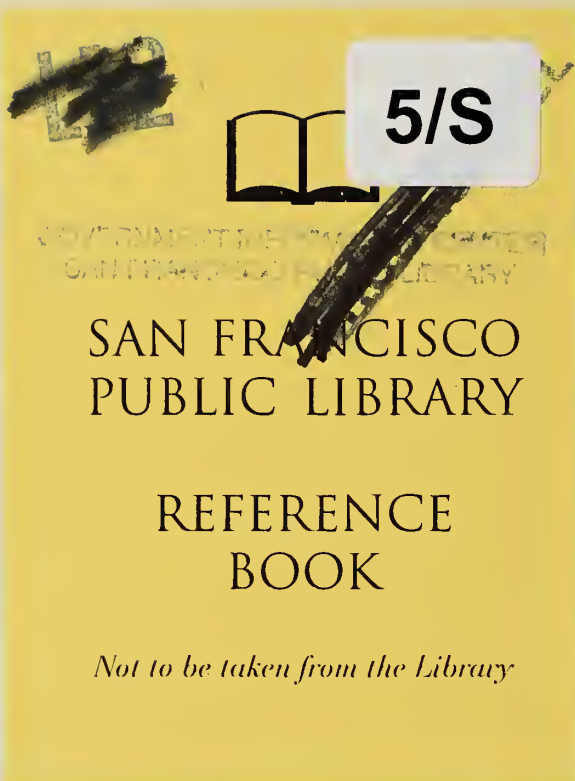
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TO: Distribution List for the 235 Second Street Williams Sonoma Mixed Use Development Project Draft EIR

FROM: Hillary Gitelman, Environmental Review Officer

SUBJECT: Request for the Final Environmental Impact Report for the 235 Second Street Williams Sonoma Mixed Use Development Project (Case No. 99.176E)

This is the draft of the Environmental Impact Report (EIR) for the 235 Second Street Project. A public hearing will be held on the adequacy and accuracy of this document. After the public hearing, our office will prepare and publish a document titled "Summary of Comments and Responses" which will contain a summary of all relevant comments on this Draft EIR and our responses to those comments; it may also specify changes to this Draft EIR. Public agencies and members of the public who testify at the hearing on the Draft EIR will automatically receive a copy of the Comments and Responses document, along with notice of the date reserved for certification; others may receive such copies and notice on request or by visiting our office. This Draft EIR together with the Summary of Comments and Responses document will be considered by the Planning Commission in an advertised public meeting and certified as a Final EIR if deemed adequate.

After certification, we will modify the Draft EIR as specified by the Comments and Responses document and print both documents in a single publication called the Final Environmental Impact Report. The Final EIR will add no new information to the combination of the two documents except to reproduce the certification resolution. It will simply provide the information on one rather than two documents. Therefore, if you receive a copy of the Comments and Responses document in addition to this copy of the Draft EIR, you will technically have a copy of the Final EIR.

We are aware that many people who receive the Draft EIR and Summary of Comments and Responses have no interest in receiving virtually the same information after the EIR has been certified. To avoid expending money and paper needlessly, we would like to send copies of the Final EIR to private individuals only if they request them. If you would like a copy of the Final EIR, therefore, please fill out and mail the postcard provided inside the back cover to the Major Environmental Analysis Office of the Planning Department within two weeks after certification of the EIR. Any private party not requesting a Final EIR by that time will not be mailed a copy.

Thank you for your interest in this project.



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235 Second Street Willams Sonoma Mixed Use Development Draft Environmental Impact Report

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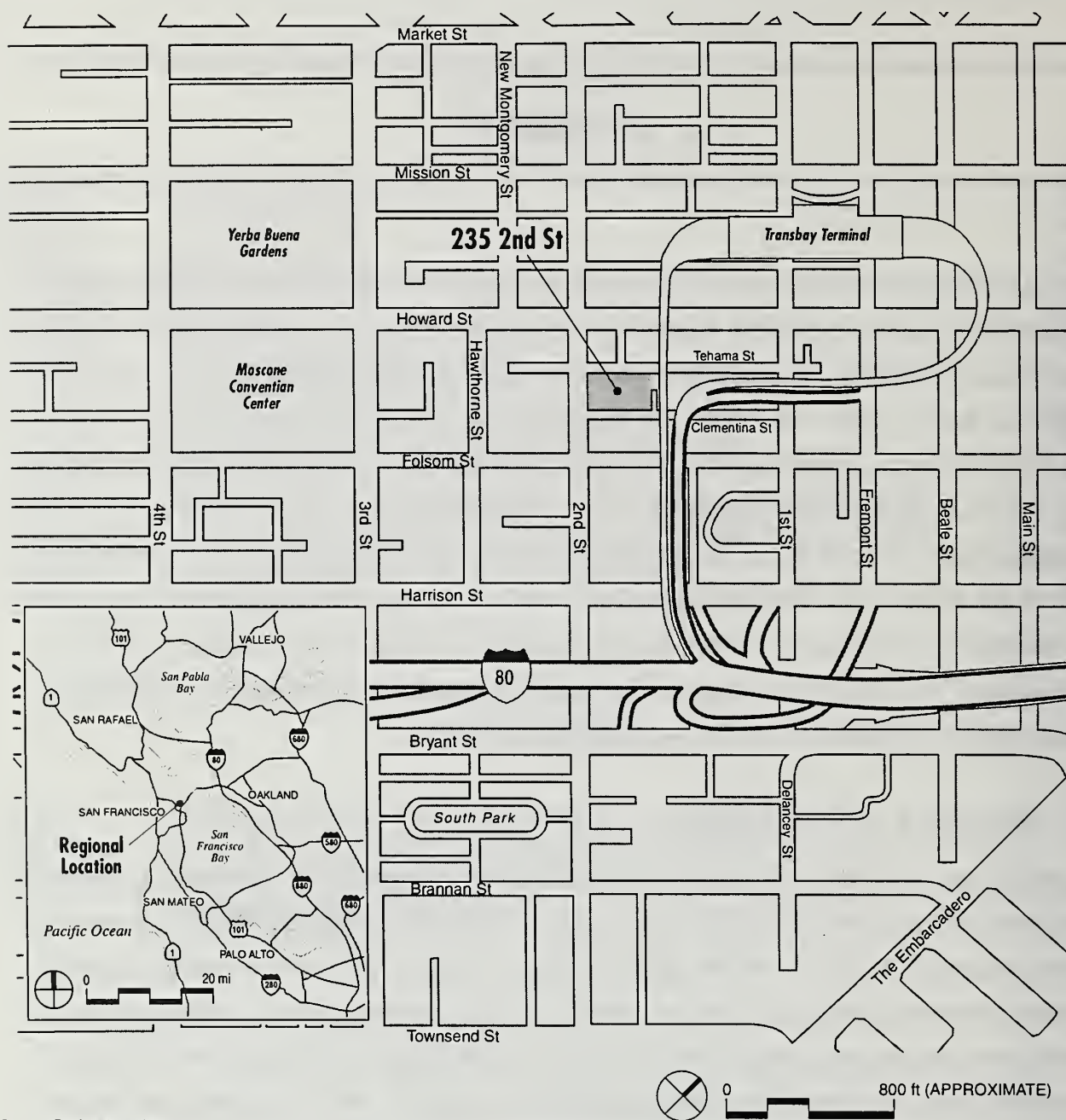
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I. SUMMARY

This is a Draft Environmental Impact Report (DEIR) prepared in accordance with the California Environmental Quality Act (CEQA) regarding the proposed mixed use building at 235 Second Street in San Francisco. An application for environmental review for the 235 Second Street project was filed on March 22, 1999. On the basis of the Initial Study published on July 10, 1999, and included as Appendix A, the San Francisco Planning Department determined that an EIR is required. Subsequent to distribution of the Initial Study, the project sponsor amended their application to expand the project site and to increase the size of the proposed building by about 14,000 square feet. This EIR is intended to assess the potential environmental effects of this modified proposal, and to allow the San Francisco Planning Commission to make an informed decision concerning the proposed 235 Second Street office, production and distribution project, required mitigation measures, and project alternatives.

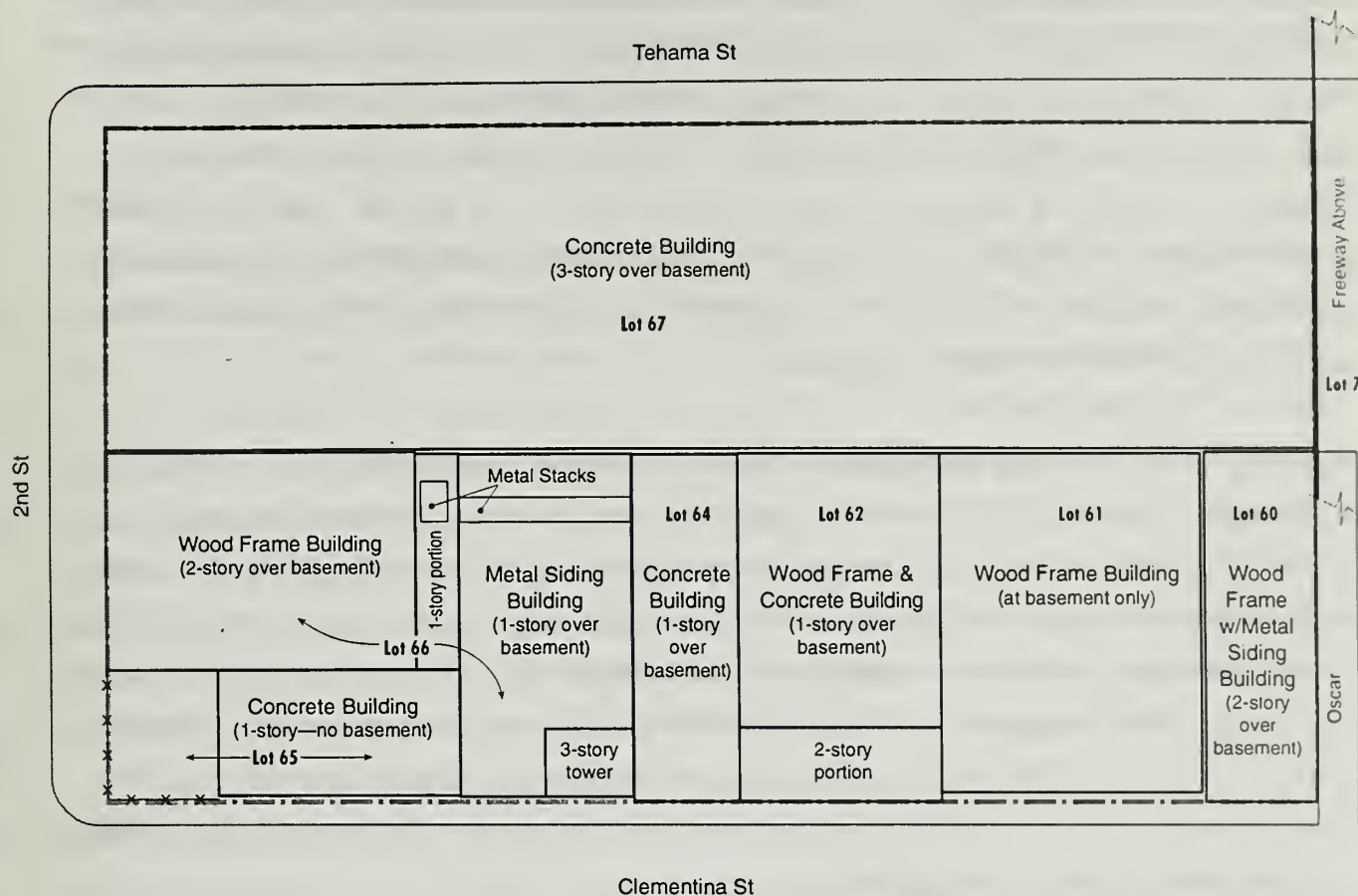
A. PROJECT DESCRIPTION

The project site is located on Second Street between Clementina and Tehama Streets, with frontages on all three streets (see Figure 1, page 2). The approximately 44,500-square-foot site consists of Lots 60, 61, 62, 64, 65, 66, and 67 in Assessor's Block 3736, and contains an existing four-story concrete building that fronts on Tehama and Second Streets, six interconnected one- and two-story industrial buildings fronting on Second and Clementina Streets, and a detached two-story building on Clementina Street (see Figure 2, page 3). All the buildings on the site, except for the two-story building on the southeast corner, were used as warehouse and distribution center for a clothing manufacturer that was acquired by another company and relocated to Southern California. The two-story wood frame building with metal siding was used as a woodworking shop. According to the project sponsor, the owner/tenant of the woodworking shop will relocate out of San Francisco due to expansion needs.



Source: During Associates

PROJECT LOCATION FIGURE 1



--- Project boundary

NOTE: All buildings are interconnected at basements and first floors, except for the building on Lot 60.



Source: Fee Munson Ebert Architects

EXISTING SITE PLAN FIGURE 2

The project sponsor, 235 Second Streets Associates, LLC, proposes to demolish seven existing one- and two-story buildings and adaptively reuse and add three stories to an existing four-story warehouse, and construct a seven-story, 88-foot-tall office, production, and distribution complex. The new building would contain approximately 267,000 gross square feet, including 180,800 sq.ft. of office space, 40,000 gsf of production and light manufacturing space, 26,600 sq.ft. of shipping, loading, and handling space, about 2,180 sq.ft. of internal open space, and approximately 17,470 sq.ft. of parking for 50 independently accessible parking spaces. A loading dock located on the southeastern end of the building, with access via Clementina Street, would provide three off-street loading spaces.

Following completion and certification of the Final EIR, the project would require Planning Commission authorization of new office space under procedures set forth in *Planning Code* Section 321, Office Development Annual Limit; Section 309 Permit Review in C-3 Districts; Section 303 conditional use approval of a major (nonaccessory) parking garage in a C-3-O District and related review for compliance with Sections 157 and 158 pertaining to the location and design of the garage; and a finding that the project is consistent with the Priority Policies of Section 101.1 of the *Planning Code* and applicable Objectives and Policies of the *General Plan*. The project would also require Planning Department and Department of Building Inspection (DBI) approval of the building permit application.

Project construction would take approximately 18 months, including demolition of the existing structures on the southern portion of the site, with occupancy planned for summer of 2001. Estimated cost of the project would be about \$12 million (1999 dollars). Fee Munson Ebert of San Francisco is the project architect.

B. MAIN ENVIRONMENTAL EFFECTS

This environmental impact report, for the 235 Second Street project, focuses on the issue of transportation. All other potential environmental effects were found to be at a less-than-significant level or to be mitigated to a less-than-significant level with mitigation measures to be implemented by the project sponsor. (Please see the Initial Study, included in this document as Appendix A, for analysis of other environmental issues.) In addition, this environmental impact report discusses land use and the project's visual impacts for informational purposes, although these issues were found to be less-than-significant in the Initial Study.

Because of the expansion of the project site since preparation of the Initial Study, historic and architectural resource issues are also addressed in this EIR. No other issue areas analyzed in the Initial Study require further attention due to proposed project modifications and none of the conclusions of the Initial Study have changed.

Land Use

The project vicinity is within the C-3 or Downtown Commercial District of the City and includes a mixture of uses, including commercial and residential uses and office buildings of varying sizes. The project site currently contains an existing four-story concrete building that fronts on Tehama and Second Streets, six interconnected one- and two-story industrial buildings fronting on Second and Clementina Streets, and a detached two-story building on Clementina Street. The proposed project would construct a new, mixed-used commercial building of approximately 267,000 sq.ft., and would result in a change in land use and would increase the intensity of land uses on the project site. However, the project would not substantially alter the general land use pattern of the immediate area since it would be achieved within the existing block configuration and would introduce or intensify uses that are already present in the general vicinity.

Visual Quality

The proposed project would result in a visual change, since it would demolish six existing one- to two-story industrial buildings on Second and Clementina Streets and construct one substantially larger seven-story building that would add three stories to the adjacent four-story warehouse on Second and Tehama Streets. The height and bulk of the proposed 88-foot-tall building would be less than that of many other buildings in the immediate vicinity, including the approximately 182-foot-high residential condominium currently under construction west of the project (across Second Street) and the proposed 162-foot-high hotel under construction just south of the project. The proposed project building would be taller and have greater bulk than the office buildings directly north of the project site.

The project would be designed to be compatible with the surrounding buildings in the area, and would be within a group of nearby buildings that would be higher and generally comparable in bulk to the project. The new building would not exceed permitted height limits, and would not obstruct any scenic views currently observed from public areas. For all of these reasons, the

project would not result in a substantial or demonstrable negative aesthetic effect and would not substantially degrade the existing visual character of the site and its surroundings.

Historic Architectural Resources

The ensemble of eight existing buildings (seven of which are interconnected at the basement and first floors) on the project site is part of a cluster of small-scale, post-fire buildings on the block bounded by First, Second, Folsom and Howard Streets, in the Financial District/South of Market area. Although other such clusters have been designated as Historic Districts under Article 10 of the *Planning Code*, or as Conservation Districts under Article 11 of the *Planning Code*, the quality of the buildings on this site has not merited such a designation. All but one of the existing buildings on the site would be demolished. None of the buildings proposed for demolition are designated landmarks or have been identified in any formal historic architectural resources survey of the area, with one exception. The building at 64 Clementina Street was identified in 1994 as appearing eligible for the National Register of Historic Places (NRHP) as part of a consensus determination by the State Historic Preservation Officer (SHPO). As a result, the building was listed in the California Register of Historical Resources. On August 6, 1999, the State Historical Resources Commission voted to remove the building from listing in the California Register, based on its impaired architectural integrity resulting from modifications to the original building. Because of its loss of integrity and because the building is no longer eligible for listing in the California Register, it is no longer considered an historical resource under definition provided in CEQA. Thus, the building's demolition would not be considered a significant environmental effect.

Transportation

The project site is in a congested area, and vehicles using streets heading to the Bay Bridge and other freeway on-ramps in the p.m. peak hour frequently experience long delays. The project would generate about 60 new vehicle trips and 142 new transit trips in the p.m. peak hour. Project traffic would result in some increase in average vehicle delay, causing the level of service at the Second/Howard intersection and the unsignalized Second/Tehama intersection to deteriorate from LOS C to LOS D. The LOS at the other study intersections (First/Howard, First/Folsom, and Second/Folsom) would remain unchanged. Project traffic would contribute incrementally to delays at intersections in the vicinity that currently operate at degraded levels of service (i.e., LOS E or F), including First/Howard and First/Folsom Streets. Under cumulative

(Year 2015) traffic conditions, operations at the signalized intersections of Second/Howard, Second/Folsom, and First/Howard Streets would deteriorate to LOS F and the unsignalized intersection of Second/Tehama Streets would deteriorate to LOS E. Traffic at these intersections is largely a function of vehicles destined for the Bay Bridge and other freeway on-ramps and conditions are projected to worsen whether or not the current project is constructed. Project contributions to cumulative traffic impacts would not be considered "considerable" or significant in this context.

The approximately 142 net new p.m. peak-hour MUNI transit trips generated by the project would not increase capacity utilization of the four MUNI screenlines surrounding downtown, and would therefore not be significant effects of the project. Similarly, the project's regional transit ridership of about 53 p.m. peak-hour riders would not increase capacity utilization on any of the regional transit carriers providing service to the East Bay, South Bay, and North Bay; therefore, effects on regional transit would not be significant. Future cumulative (2015) increases in ridership would exceed capacity on three of the MUNI screenlines, as well as on East Bay-bound BART trains and AC Transit buses. All three transit agencies would need to increase capacity to accommodate the growth in ridership. However, the proposed project's contribution to cumulative increases in transit demand would be small (less than 1 percent) and the conditions in 2015 would occur with or without the project. The project would therefore not have a significant impact on transit services and capacity.

The project would create additional parking demand of about 215 parking spaces, less than a quarter of which would be met by the 50 spaces that would be provided by the project. The excess parking demand would increase weekday mid-afternoon occupancy in off-street parking garages, which are already at an overall capacity of 88 percent. Some drivers may have difficulty finding alternative parking accommodations and may be forced to switch to transit or other forms of travel. The project's proposed three off-street loading spaces would meet both loading demand and the Planning Code requirement.

Neither pedestrian nor bicycle conditions would be substantially affected by the project.

In summary, the project would not result in a significant impact on traffic, transit, circulation, or parking.

C. MITIGATION MEASURES

Mitigation measures identified in this EIR or in the Initial Study [which are identified here by an asterisk (*)] as necessary to mitigate significant effects are listed below.

1. Construction Air Quality

- * a. The project sponsor shall require the contractor(s) to sprinkle demolition sites with water during demolition, excavation, and construction activity twice daily; sprinkle unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover debris, soil, sand, or other such material being hauled on trucks; and sweep surrounding streets during demolition and construction at least once per day to reduce particulate emissions. Ordinance No. 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor would require that the contractor(s) obtain reclaimed water from the Clean Water Program for this purpose.
- * b. The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as prohibiting idling motors when equipment is not in use or when trucks are waiting in queues, and implementing specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

2. Hazards

- * a. The project sponsor shall ensure that the construction contractor limits the amount of excavation, and handles and disposes of excavated soils properly. Soil excavated for offsite disposal or use shall be characterized for the specific constituents of concern based on the requirements of the accepted facility or party; this characterization should be performed on a representative volume of stockpiled soil.
- * b. The project sponsor shall ensure that building surveys for asbestos, PCB-containing equipment (including elevator equipment), hydraulic oils, fluorescent lights, and lead-based paint are performed prior to the start of demolition. Any hazardous materials so discovered would be abated according to federal, state, and local laws and regulations.

3. Transportation

- a. During the construction period, construction truck movement would be permitted only between 9:00 a.m. and 3:30 p.m. to minimize peak-hour traffic (including transit) conflicts. The project sponsor and construction contractor(s) would meet with the Traffic Engineering Division of the Department of Parking and Traffic, the Fire Department, MUNI, Golden Gate Transit, and the Department of City Planning to determine feasible traffic mitigation measures to reduce traffic congestion, including transit disruption (for example,

potential relocation of bus stops), and pedestrian circulation impacts during construction of this project and other nearby projects that are planned for construction or which later become known. To minimize cumulative traffic impacts due to lane closures during construction, the project sponsor would ensure that the construction contractor coordinate with construction contractor(s) for any concurrent nearby projects that are planned for construction or become known.

4. Cultural Resources

- * a. Should evidence of archaeological resources of potential significance be found during ground disturbance, the project sponsor would immediately notify the Environmental Review Officer (ERO), and would suspend any excavation which the ERO determined could damage such archaeological resources. Excavation or construction activities which might damage cultural resources would be suspended for a total maximum of four weeks over the course of construction.

After notifying the ERO, the project sponsor would select an archaeologist to assist the Office of Major Environmental Analysis in determining the significance of the find. The archaeologist would prepare a draft report containing an assessment of the potential significance of the find and recommendations for what measure should be implemented to minimize the potential effects on archaeological resources. Based on this report, the ERO would recommend specific mitigation measures to be implemented by the project sponsor.

Mitigation measure might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation, and recovery of the cultural material. Finally, the archaeologist would prepare a report documenting the cultural resource that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure would be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report would be sent to the President of the Landmarks Preservation Advisory Board and the California Archaeological Site Survey Northwest Information Center. The Office of Major Environmental Analysis shall receive three copies of the final archaeological report.

D. ALTERNATIVES TO THE PROPOSED PROJECT

CEQA requires an analysis of a reasonable range of alternatives that would reduce or eliminate significant impacts of a project while obtaining most of the sponsor's objectives. Although the 235 Second Street project would not result in any unmitigable significant impacts, a no project and reduced development alternative have been included in this analysis. These alternatives would reduce nonsignificant effects related to transportation and other environmental issues.

Alternative A: No Project

This alternative would entail no change to the site, which would remain in its existing condition. The existing building 235 Second Street building would not be adaptively reused and enlarged, and the six existing buildings immediately to the south would not be demolished. The existing building could be occupied by a warehouse and distribution use similar to the one that currently occupies the building.

This alternative would result in no increase in vehicle travel or transit use, as would occur with implementation of the proposed project. There would be no project-specific effects on intersection conditions, transit use, parking, loading, or pedestrian or bicycle traffic. (These impacts would all be less than significant with the project.) Other less-than-significant effects described in the Initial Study, including emissions of air pollutants, generation of noise (and possibly vibration) during construction, potential discovery of subsurface cultural resources during excavation, and demolition of existing one- and two-story buildings, among other impacts, would not occur with this alternative.

The No Project Alternative would not meet any of the project objectives.

Alternative B: Reduced Development

This alternative would entail adaptive reuse of the existing four-story, 88,000-square-foot warehouse and distribution building located at Second and Tehama Streets and construction of a new three-story, 62,000-square-foot distribution and production building immediately to the south. The six existing one- and two-story industrial buildings on the southern portion of the project site would be demolished to accommodate the new building. The existing four-story building would be converted to office use and would provide about 40 parking spaces in the basement of the building that would be accessed from a driveway on Tehama Street. The two buildings would be interconnected at ground level and would together provide a total of 150,000 square feet of space (88,000 gsf of office use and 62,000 gsf of distribution and production use). Due to the reduced square footage devoted to office use, this alternative would result in a decrease in vehicle trip generation and transit use, as compared to the proposed project. During the p.m. peak hour, this alternative would generate about 125 person trips, of which, about 38 would be vehicle trips. The reduction would translate to minor reductions (i.e., generally less than 1 second) in delays at the five study intersections when compared to the proposed project.

This alternative would constitute less of a visual change because the project building would be reduced from seven and six stories, respectively, to four and three stories. Non-significant shadow effects of this alternative would also be incrementally less than those of the proposed project, due to reduced building height.

Other effects described in the Initial Study for the proposed project would also occur at a lesser or similar level under this alternative. Many project components would be the same, including demolition of six existing buildings, excavation and new construction on the site. All impacts would remain less than significant with implementation of the mitigation included in the proposed project.

E. ISSUES TO BE RESOLVED AND AREAS OF CONTROVERSY

As with all projects, the project design will continue to evolve as the sponsor makes refinements and receives input from the Planning Department and Planning Commission. The project is analyzed in this EIR at a level of analysis sufficiently broad to permit these refinements without necessarily triggering new environmental review, yet in sufficient detail to identify specific potential physical effects on the environment. Subsequent changes in the project will be evaluated to ensure that they would not cause new or substantially more severe environmental impacts.

There are no areas of substantial controversy known to the EIR preparers.

II. PROJECT DESCRIPTION

A. PROJECT SPONSOR'S OBJECTIVES

235 Second Street Associates, LLC, the project sponsor, proposes to develop an approximately 267,000 square-foot, seven-story, office, parking, production and distribution complex for Williams-Somona Inc., by means of the demolition of six inter-connected buildings, the reuse of and three-story addition to an existing four-story warehouse, and the construction of a new building at 235 Second Street. The project sponsor has the following objectives:

- To provide a building that will produce high-quality commercial office space that is within walking distance of the Downtown and accessible to various modes of public transportation.
- To construct an addition and new building that integrates the style while preserving the characteristics of the existing building and similar buildings in the neighborhood.
- To construct such an office complex with the highest floor of occupancy under 75 feet in height to take advantage of cost savings available for buildings that do not require high rise construction.
- To provide desirable office space that will be consistent with the intensification of land uses in the vicinity of the site while complementing the scale of the existing and planned developments.
- To complete the project on schedule and within budget.
- To maintain the headquarters of Williams-Sonoma, Inc., in San Francisco by consolidating its operations in a single site tailored to office, catalogue printing, light manufacturing of display samples, production, shipping and distribution.

B. SITE LOCATION AND PROJECT CHARACTERISTICS

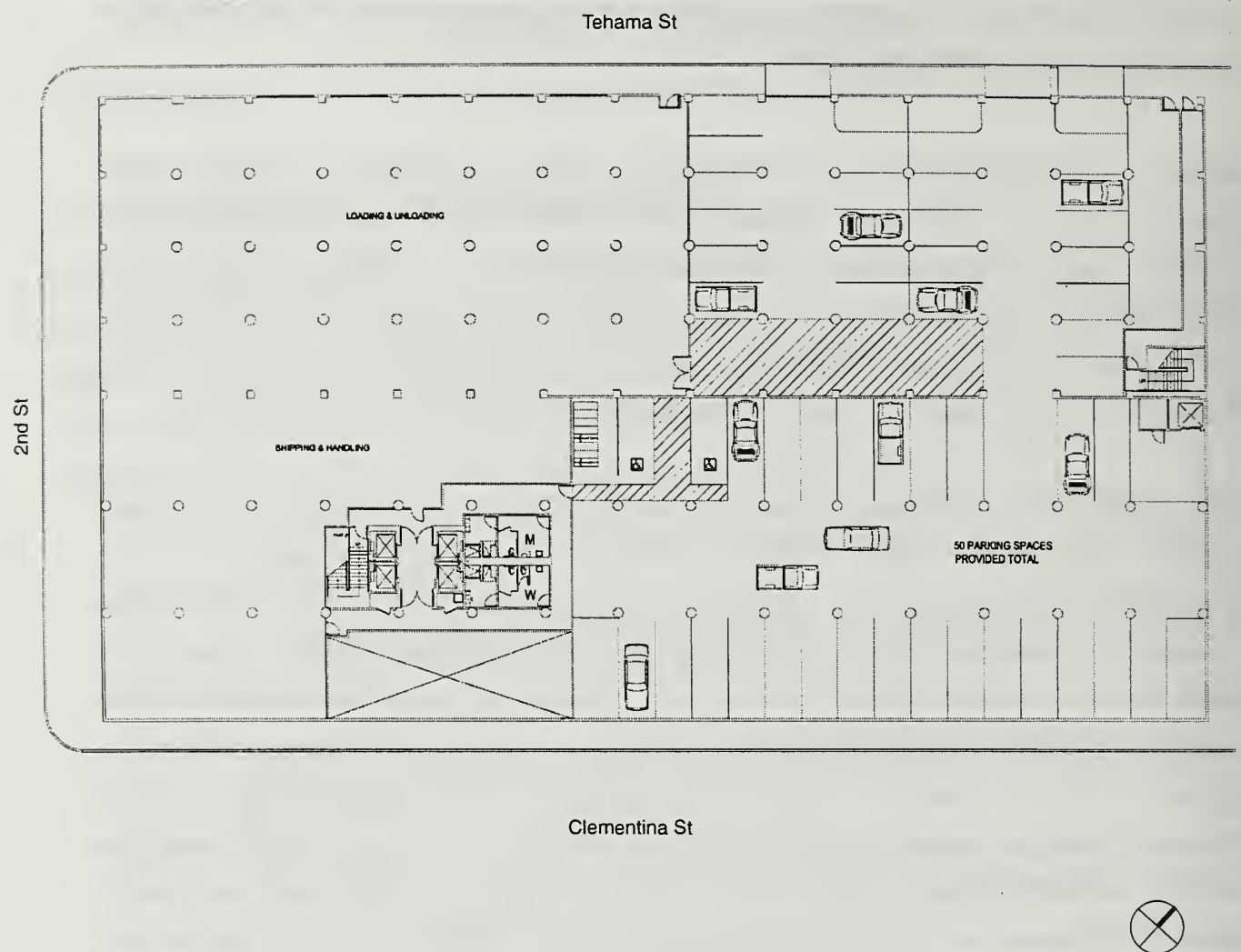
The project site is located in the quarter-block bounded by Second, Tehama, Clementina, and First Streets in the Transbay Terminal Area (see Figure 1, page 2). The site consists of eight contiguous parcels: Lots 60, 61, 62, 64, 65, 66, and 67 in Assessor's Block 3736, and is approximately 44,500 square feet in area. The site is currently occupied in the northern half (Lot 67) by a four-story 88,000-square-foot reinforced concrete building that fronts on Tehama and Second Streets and on the southern half (Lots 61, 62, 64, 65, and 66) by six interconnected one-

and two-story industrial buildings, and a detached two-story building (Lot 60) containing a woodworking shop (see Figure 2, page 3). The existing buildings on the site comprise a total of 129,420 square feet of space and are all interconnected, except for the two-story building on the southeast corner of the project site.

The project site is located in downtown San Francisco within a C-3-O (Downtown Office) District, where the intensity of building development is the greatest in the City, and where a variety of commercial and residential uses are permitted. The site is primarily in a 350-S Height and Bulk District, which permits development to a height of 350 feet provided that bulk restrictions and setback requirements are met, or that exceptions are granted pursuant to the provisions of the *Planning Code*. The eastern portion of the site is within a 200-S Height and Bulk District.

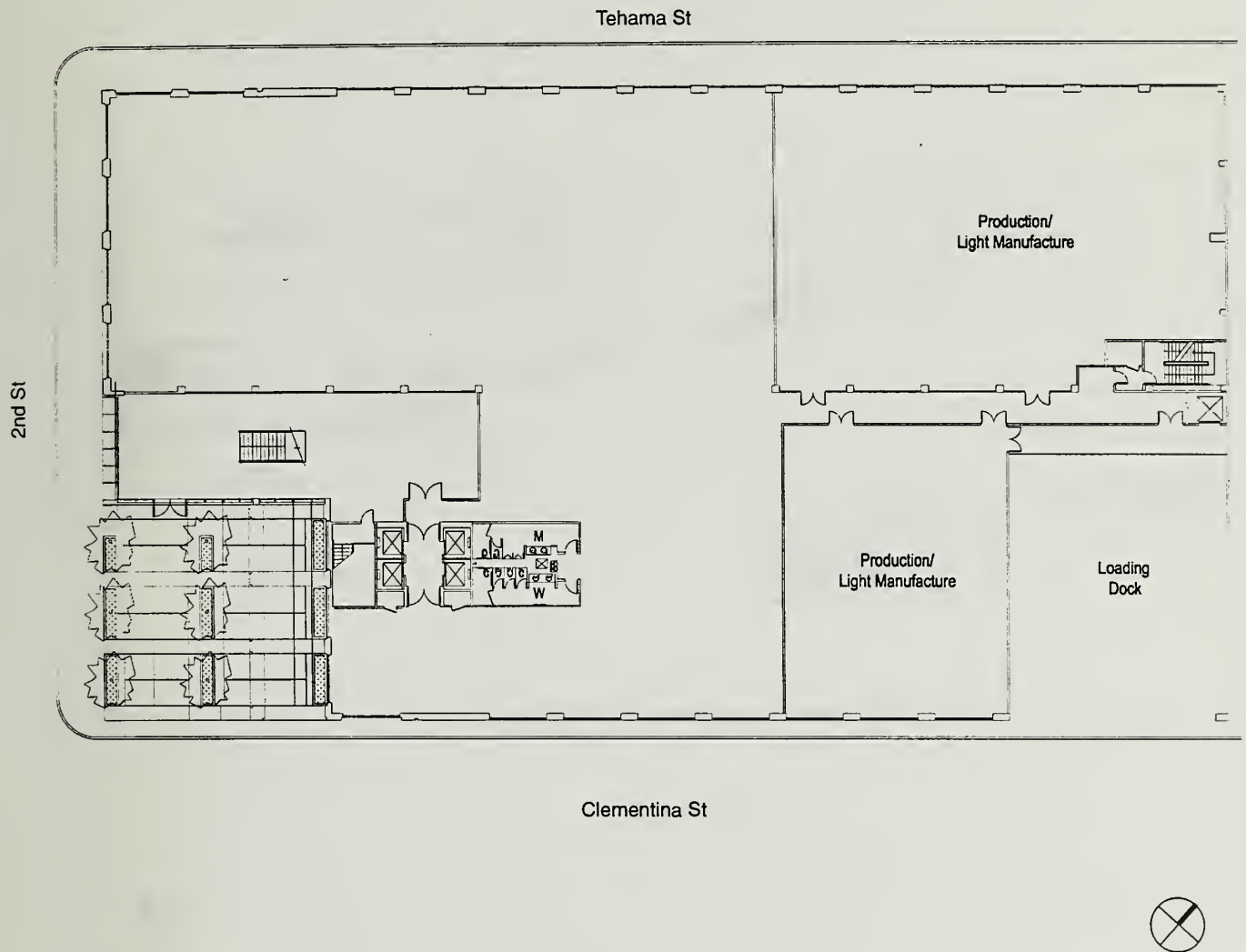
The project sponsor, 235 Second Street Associates, LLC, proposes to demolish the seven buildings on the southern portion of the project site and construct in their place a seven-story, approximately 88-foot-tall building. The existing four-story building on the northern portion of the site would be retained and adaptively reused, and three additional floors of approximately 20,000 square feet each would be added to the building. This building would be integrated with the new six-story building to form a single structure of approximately 267,000 gross square feet (see Figures 3, 4, 5, 6, 7, 8 and 9). The proposed building would house a distribution center for Williams-Sonoma that would include offices (approximately 180,800 square feet); catalogue printing, manufacturing and production of display samples (about 40,000 square feet); parking (about 17,470 square feet for 50 spaces); shipping and distribution (about 26,600 square feet); and about 2,180 square feet of internal open space. The company would relocate employees from existing offices at 3250 Van Ness Avenue, 100 North Point, and 900 Geary Street.

The approximately 41,900-square-foot ground floor of the new building would be below grade on Clementina Street due to the downward slope of the site to the north, and the ground floor would be at grade at Tehama Street, where there would be two driveways providing ingress and egress for the parking garage. The first floor would contain the main pedestrian entrance and lobby (approximately 2,130 square feet), about 19,410 square feet of office space, about 13,330 square feet of production/light manufacturing space, and about 3,800 square feet of loading space. There would be an approximately 3,230-square-foot plaza next to the entrance on the corner of Second and Clementina Streets. The second and third floors would contain about



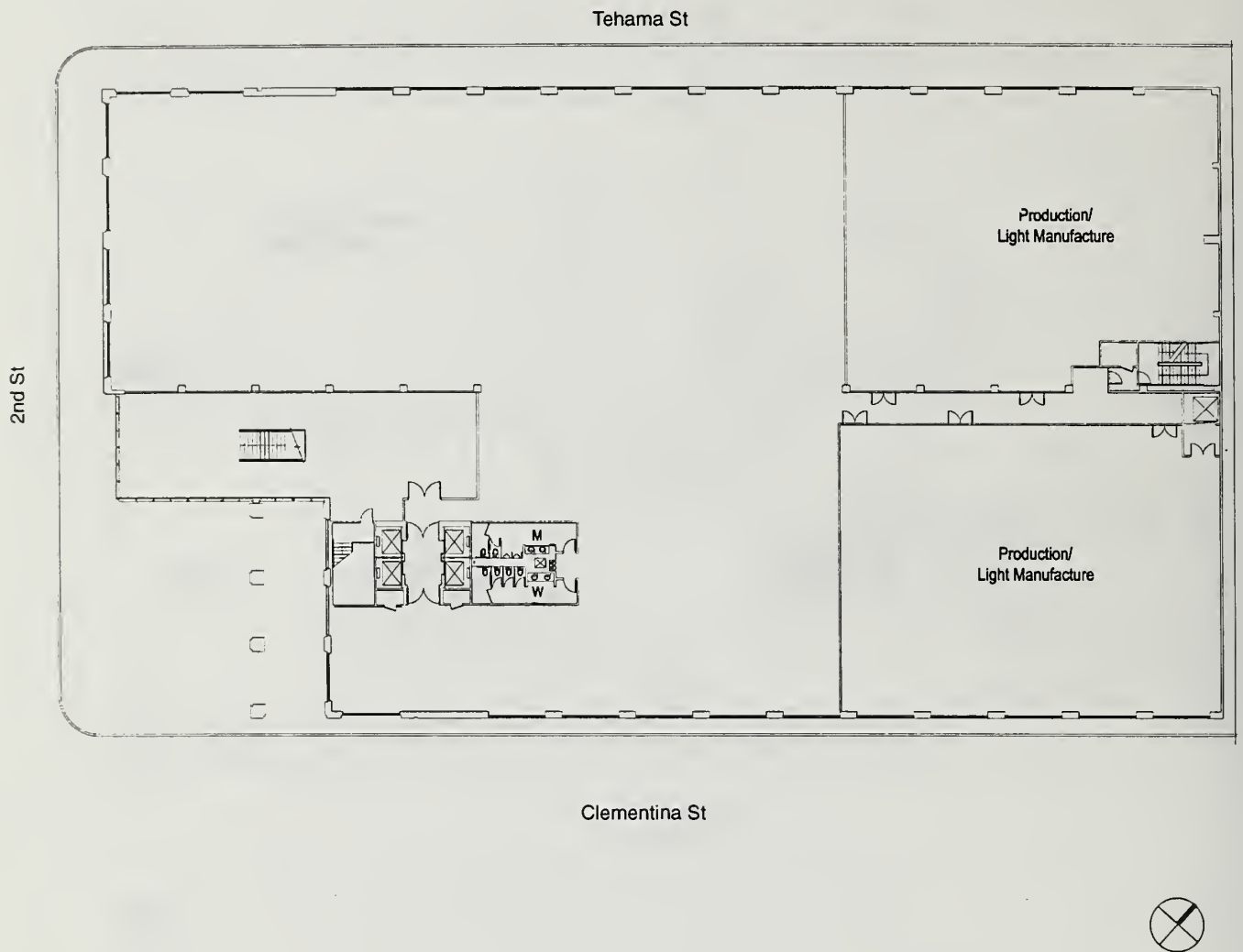
Source: Fee Munson Ebert Architects

LOWER LEVEL FLOOR PLAN FIGURE 3



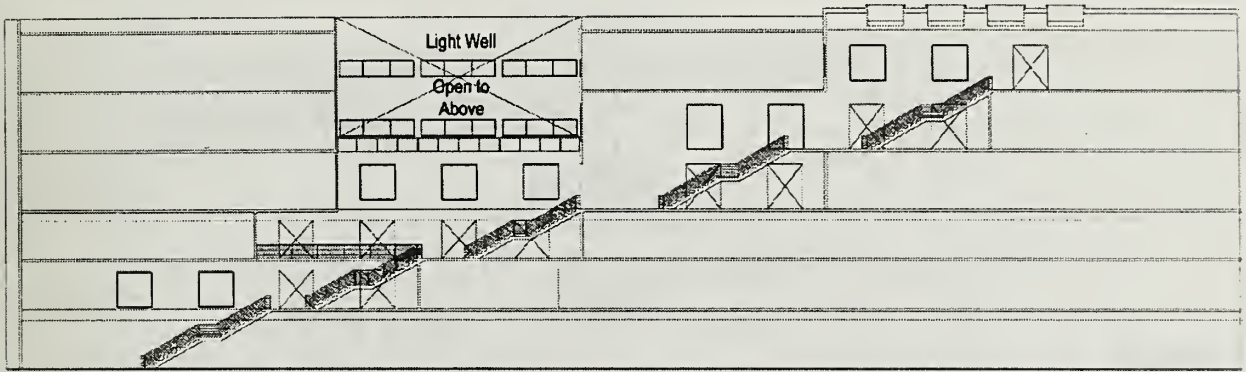
Source: Fee Munson Ebert Architects

FIRST FLOOR PLAN FIGURE 4



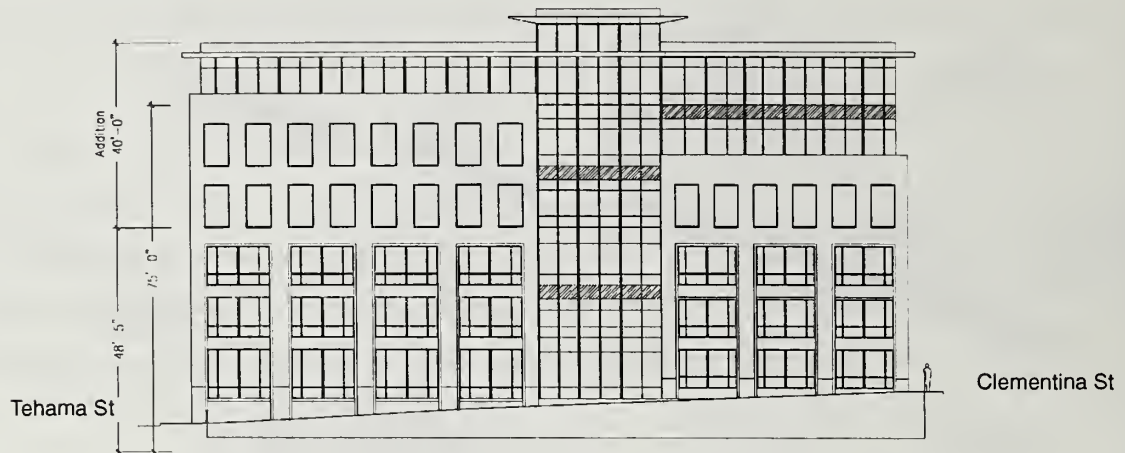
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SECOND FLOOR PLAN **FIGURE 5**



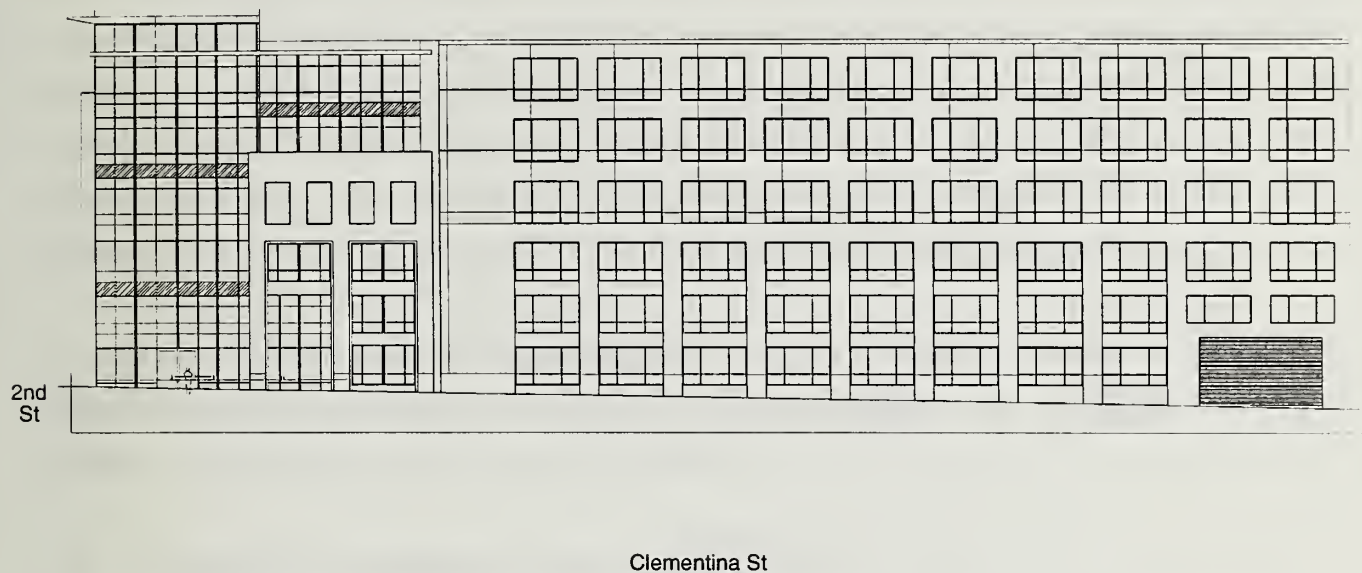
Source: Fee Munson Ebert Architects

SECTION FIGURE 6



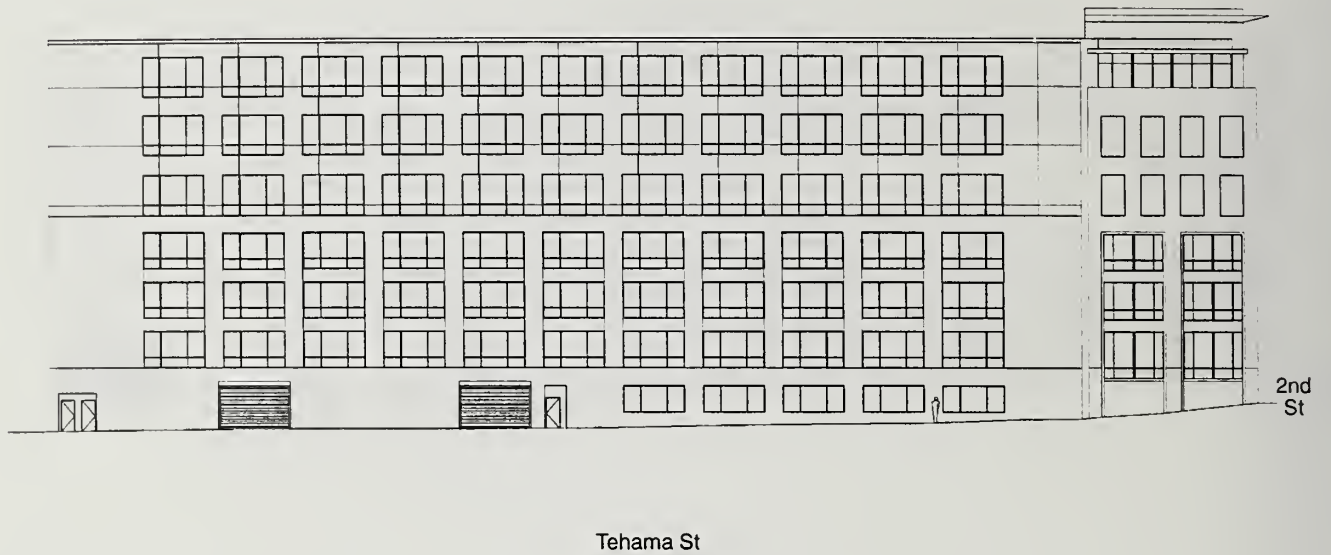
Source: Fee Munson Ebert Architects

WEST ELEVATION FROM 2ND STREET FIGURE 7



Source: Fee Munson Ebert Architects

SOUTH ELEVATION FROM CLEMENTINA STREET FIGURE 8



Source: Fee Munson Ebert Architects

NORTH ELEVATION FROM TEHAMA STREET FIGURE 9

21,720 square feet and 25,340 square feet, respectively, of office space, and each floor would contain about 13,330 square feet of production/light manufacturing space. The fourth, fifth, and sixth floors would contain about 38,716 square feet, 37,306 square feet, and 38,606 square feet of office space, respectively.

The existing buildings on the site (totaling about 129,420 square feet) contain about 2,500 square feet of office space, about 61,500 square feet of warehouse space, and about 61,500 square feet of loading and distribution space. Thus, the proposed project would contain a net increase of approximately 178,290 square feet of office space and about 36,000 square feet of production and light manufacturing space, and a net decrease of about 34,900 square feet of shipping and loading space and about 61,500 square feet of warehouse space.

Project construction would take approximately 18 months, including demolition of the existing structures on the southern portion of the site. The project construction cost is estimated at \$12 million. The project architect is Fee Munson Ebert.

C. PROJECT APPROVAL REQUIREMENTS

This EIR will undergo a public comment period as noted on the cover, including a public hearing before the Planning Commission on the Draft EIR. Following the public comment period, responses to written and oral comments will be prepared and published in a Draft Summary of Comments and Responses. The Draft Summary of Comments and Responses will be presented to the Planning Commission together with the Draft EIR for certification as a Final EIR. No approvals or permits may be issued before the Final EIR is certified.

The project is located within the boundaries of the Downtown Plan, an Area Plan of the San Francisco General Plan. The Downtown Plan is the policy document that guides growth and development in San Francisco's downtown area. Centered on Market Street, the Plan covers an area roughly bounded by Van Ness Avenue to the west, The Embarcadero to the east, Folsom Street to the south, and the northern edge of the Financial District to the north. The Plan contains objectives and policies that address the following issues: provision of space for commerce, housing, and open space; preservation of the past; urban form; and movement to, from, and within the downtown area (transportation).

The Downtown Plan was intended to manage growth in this area, including maintaining a compact downtown core and directing growth to areas with developable space and easy transit accessibility, while the Downtown Plan limited growth in the traditional downtown by adjusting height limits and FARs (floor area ratios), and identified specific South of Market areas, which include the proposed project site, for high-rise office development. General Plan policies are discussed further in the Land Use section of this EIR.

The project is within a C-3-0 SD (Downtown Office-Special Development) District. The *Planning Code* states that the C-3-0 SD District "accommodates near the intensive downtown core areas important supporting functions such as wholesaling, printing, building services, secondary office space and parking. According to the *Planning Code*, "The district has for the most part been under-developed in the past, and opportunities exist for major developments of new uses covering substantial areas" (Section 210.3). Office, printing, manufacturing, shipping and distribution uses are principally permitted in the C-3-0 SD District. Parking is permitted as a conditional use or an accessory use pursuant to Section 204.5 of the *Planning Code*.

The project site is also within the 350-S Height and Bulk District which permits buildings up to 350 feet in height, with setbacks above the base (generally above a streetwall height up to 1.25 times the width of the widest abutting street or 50 feet, whichever is more). A narrow strip along the eastern side of the site is within the 200-S Height and Bulk District, which permits buildings up to 200 feet in height, with similar setbacks to the 350-S Height and Bulk District. At 88 feet maximum height and a maximum width of 270 feet, the proposed project would be within the 350 height limit and would not require any exception from the bulk limits.

Section 309 of the *City Planning Code*, Permit Review in C-3 Districts, governs the review of project authorization and building and site permit applications in C-3 Districts. Section 309 also permits the imposition of certain conditions in regard to such matters as a project's siting and design, view, parking, traffic and transit effects; energy consumption; pedestrian environmental; and other matters. As an office project, the project would also be subject to *City Planning Code* Section 321 - Office Development: Annual Limit, and certain other *Planning Code* sections: open space requirements (Section 138); pedestrian streetscape improvements (Section 138.1); downtown park fees (Section 139); street trees (Section 143); public art (Section 149); requirements; transportation management and transportation brokerage services (Section 163);

the Office of Affordable Housing Production Program (Section 313 et. seq., proposed to be renamed the Jobs-Housing Linkage Program); and child care provisions fees (Section 314 et. seq.); as well as transit development impact fees under Article 38 of the Administrative Code. Because the square footage of the parking garage exceeds the amount permitted as accessory, the project would require Conditional Use authorization pursuant to Section 303 as a major parking garage, and the location and design of the garage would be subject to review under the criteria set forth in Sections 157 and 158. The project would also require approval of demolition and building permits by the Department of Building Inspection.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the *San Francisco Planning Code* to establish eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; maximization of earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under the California Environmental Quality Act (CEQA) or adopting any zoning ordinance or development agreement, the Planning Commission is required to find that the proposed project or legislation is consistent with the Priority Policies. The motion by the Planning Commission approving or disapproving the project will contain the analysis determining whether the project is in conformance with the Priority Policies.

III. ENVIRONMENTAL SETTING AND IMPACTS

An application for environmental evaluation for the 235 Second Street project was filed on March 22, 1999. On the basis of an Initial Study published on July 10, 1999, and included as Appendix A, the San Francisco Planning Department determined that an Environmental Impact Report (EIR) is required. The Initial Study determined that the EIR should be focused on issues related to transportation and that issues related to land use, visual quality, glare, population and housing, noise, construction air quality, wind, shadow, utilities and public services, biology, hydrology, water quality, geology and topography, energy and natural resources, hazards, and cultural resources (archaeology and historic and architectural resources) require no further discussion. Nonetheless, the topics of land use and visual quality are included in this EIR for informational purposes.

Subsequent to publication of the Initial Study, the project sponsor modified the project proposal to expand the site, demolish one additional building, and expand the new building. Project modifications are not of a magnitude that would materially affect the analysis or conclusions of the Initial Study, except in the area of historic architectural resources. This topic has therefore been included in the EIR.

A. LAND USE AND GENERAL PLAN CONFORMITY

Land Use

The northern half of the site is currently occupied by a four-story cement warehouse building, and the southern half contains six interconnected one- to two-story industrial buildings and a detached two-story building containing a woodworking shop. All but one of the buildings on the project site are currently operated as a distribution center for a clothing manufacturer (Fritzi California), which is being consolidated and relocated out of San Francisco. Although the immediate vicinity is dominated by small office buildings, the area to the south and west of the project block is more characterized by a mixture of uses in a wide variety of building types and

sizes. For example, the Planter's Hotel building on the northwest corner of Second and Folsom Streets is a five-story wood frame office building with ground-floor retail use, while a 13-story residential tower is under construction immediately west of the site. Also west of the site is the Marine Fireman's Union building, a one-story marble building. In the center of the block, on Hawthorne Street, is a 20-story office building. The full block west of Hawthorne Street contains the new Hotel Westin at the corner of Third and Folsom Streets, several major restaurants, and a large parking garage for the Yerba Buena Center.

A number of new projects are planned or under construction near the project site. A 17-story, 162-foot-high, 414-room hotel is planned directly south of the project on Second and Clementina Streets; an 8-story, 109-foot-high, approximately 242,000-gross-square-foot office building has been approved for construction on the south side of Folsom Street (631 Folsom) between Second and Hawthorne Streets; a 16-story, 225-foot-high, about 237,000-gross-square-foot office building has been approved for over a decade at the southwest corner of Howard and Second Streets (222 Second Street), and a 13-story, about 182-foot-high, 91-unit residential building complex is under construction at 246 Second Street west of the project. A residential project has been approved on Hawthorne and Zoe Streets, and a 27-story office buildings is under construction at 101 Second Street at Mission Street, about two blocks north of the project site.

East of the project site an elevated bus ramp extends in a north-south direction, leading from the Bay Bridge to the Transbay Terminal, located at First and Mission Streets. The area under the ramp is used for public parking from south of Harrison Street to north of Howard Street. West of the project site on Second Street is the marble Marine Fireman's Union Building. A 19-story office building faces Hawthorne Street (75 Hawthorne Street) to the west of the new residential building under construction on Second Street.

The proposed project would change land uses on the site from loading and distribution to a mixture of office, distribution, manufacturing, and parking, and would thus increase the intensity of uses on the project site. The office, production, and distribution uses proposed for the site are permitted uses in the C-3-O SD Zoning District and would be consistent with the existing and planned uses in the vicinity. The project would not have a substantial adverse effect on land use. Because the project would be developed within the existing block and street configuration, it could not divide the physical arrangement of an established community.

General Plan

As previously stated, the project is located within the boundaries of the Downtown Plan, an Area Plan of the San Francisco General Plan. The Downtown Plan is the policy document that guides growth and development in San Francisco's downtown area. Centered on Market Street, the Plan covers an area roughly bounded by Van Ness Avenue to the west, The Embarcadero to the east, Folsom Street to the south, and the northern edge of the Financial District to the north. The Plan contains objectives and policies that address the following issues: provision of space for commerce, housing, and open space; preservation of the past; urban form; and movement to, from, and within the downtown area (transportation).

The Downtown Plan was intended to manage growth in this area, including maintaining a compact downtown core and directing growth to areas with developable space and easy transit accessibility, while the Downtown Plan limited growth in the traditional downtown by adjusting height limits and FARs (floor area ratios), and identified specific South of Market areas, which include the proposed project site, for high-rise office development. General Plan policies are discussed further below.

While no obvious or substantial conflicts with the General Plan have been identified, the Planning Commission would review the project further in the context of all applicable objectives and policies of the San Francisco General Plan as part of the decision to approve, modify, or disapprove the proposed project. Any potential conflict not identified here could be considered in that context, and would not alter the physical environmental effects of the proposed project. Some of the key objectives and policies of the General Plan are noted below:

DOWNTOWN PLAN

- Objective 1, Policy 1, to "Encourage development which produces substantial net benefits and minimizes undesirable consequences. Discourage development which has substantial undesirable consequences which cannot be mitigated."
- Objective 2, Policy 1, to "Encourage prime downtown office activities to grow as long as undesirable consequences of such growth can be controlled."
- Objective 2, Policy 2, to "Guide the location of office development to maintain a compact downtown core and minimize displacement of other uses."
- Objective 3, Policy 4, to "Limit the amount of downtown retail space outside the retail district to avoid detracting from its economic vitality."
- Objective 3, Policy 5, to "Meet the [retail] convenience needs of daytime downtown workers."

- Objective 5, to "Retain a diverse base of support commercial activity in and near downtown."
- Objective 5, Policy 1, to "Provide space for support commercial activities within the downtown and in adjacent areas."
- Objective 9, Policy 1, to "Require usable indoor and outdoor open space, accessible to the public, as part of new downtown development."
- Objective 9, Policy 2, to "Provide different kinds of open space downtown."
- Objective 9, Policy 4, to "Provide a variety of seating arrangements in open spaces throughout downtown."
- Objective 10, to "Assure that open spaces are accessible and usable."
- Objective 10, Policy 2, to "Encourage the creation of new open spaces that become a part of an interconnected pedestrian network."
- Objective 10, Policy 4, to "Provide open space that is clearly visible and easily reached from the street or pedestrian way."
- Objective 10, Policy 5, to "Address the need for human comfort in the design of open spaces by minimizing wind and maximizing sunshine."
- Objective 12, Policy 3, to "Design new buildings to respect the character of older development nearby."
- Objective 13, Policy 1, to "Relate the height of buildings to important attributes of the city pattern and to the height and character of existing and proposed development."
- Objective 13, Policy 4, to "Maintain separation between buildings to preserve light and air and prevent excessive bulk."
- Objective 14, Policy 1, to "Promote building forms that will maximize the sun access to open spaces and other public areas."
- Objective 14, Policy 2, to "Promote building forms that will minimize the creation of surface winds near the base of buildings."
- Objective 15, Policy 1, to "Ensure that new facades relate harmoniously with nearby façade patterns."
- Objective 15, Policy 2, to "Assure that new buildings contribute to the visual unity of the city."
- Objective 15, Policy 3, to "Encourage more variation in building façades and greater harmony with older buildings through use of architectural embellishments and bay or recessed windows."
- Objective 16, Policy 2, to "Provide setbacks above a building base to maintain the continuity of the predominant streetwalls along the street."
- Objective 16, Policy 3, to "Maintain and enhance the traditional downtown street pattern of projecting cornices on smaller buildings and projecting belt courses on taller buildings."

- Objective 16, Policy 4, to “Use designs and materials and include activities at the ground floor to create pedestrian interest.”
- Objective 16, Policy 5, to “Encourage the incorporation of publicly visible art works in new private development and in various public spaces downtown.”
- Objective 19, Policy 1, to “Include facilities for bicycle users in governmental, commercial, and residential developments.”
- Objective 21, Policy 1, to “Provide off-street facilities for freight loading and service vehicles on the site of new buildings sufficient to meet the demands generated by the intended uses. Seek opportunities to create new off-street loading for existing buildings.”
- Objective 21, Policy 2, to “Discourage access to off-street freight loading and service vehicle facilities from transit preferential streets, or pedestrian-oriented streets and alleys.”
- Objective 23, to “Reduce hazards to life safety and minimize property damage and economic dislocations resulting from future earthquakes.”
- Objective 23, Policy 2, to “Initiate orderly abatement of hazards from existing buildings and structures, while preserving the architectural and design character of important buildings.”

COMMERCE AND INDUSTRY ELEMENT

- Objective 2, to “Maintain and enhance a sound and diverse economic base and fiscal structure for the city.”
- Objective 2, Policy 1, to “Seek to retain existing commercial and industrial activity and to attract new such activity to the city.”

TRANSPORTATION ELEMENT

- Policy 30.5, to “In any large development, allocate a portion of the provided off-street parking for compact automobiles, vanpools, bicycles, and motorcycles commensurate with standards that are, at a minimum, representative of the city's vehicle population.”
- Policy 30.6, to “Make existing and new accessory parking available to nearby residents and the general public for use as short-term or evening parking when not being utilized by the business or institution to which it is accessory.”
- Objective 32, to “Limit parking in downtown to help ensure that the number of auto trips to and from downtown will not be detrimental to the growth or amenity of downtown.”
- Policy 32.1, to “Discourage new long-term commuter parking spaces for single-occupant automobiles in and around downtown. Limit the long-term parking spaces to the number that already exists.”
- Policy 40.1, to “Provide off-street facilities for freight loading and service vehicles on the site of new buildings sufficient to meet the demands generated by the intended uses. Seek opportunities to create new off-street loading facilities for existing buildings.”
- Policy 40.3, “Off-street loading facilities and spaces in the downtown area should be enclosed and accessible by private driveways designed to minimize conflicts with pedestrian, transit, and automobile traffic.”

URBAN DESIGN ELEMENT

- Objective 1, Policy 3, to “Recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts.”
- Objective 2, Policy 6, to “Respect the character of older development nearby in the design of new buildings.”

COMMUNITY SAFETY ELEMENT

- Policy 2.1, to “Assure that new construction meets current structural and life safety standards.”

B. URBAN DESIGN**Setting**

The existing building on Second Street at Tehama Street is a four-story white-painted concrete building (Figure 10, page 30). The building's general appearance is reflective of its use as a warehouse and distribution center. Adjacent to and south of this building is a collection of six interconnected metal and/or concrete industrial buildings, and a single two-story building all devoid of windows or adornments (Figure 11, page 31).

Other buildings on the east side of Second Street to the north of the project site are two modern three- and four-story buildings constructed of cement and brick, respectively. A surface parking lot is located immediately south of the project site where the new hotel is planned for construction. Across Second Street from the project site, a high-rise residential building is under construction adjacent to the marble Marine Fireman's Union Building on the north and a four-story wood frame office building to the south. To the east of the project site the most prominent structure is the elevated freeway and bus ramp leading to Fremont Street and the Transbay Terminal.

The project site is not readily visible in mid-range and long-range views because of surrounding development and the freeway ramps, except along the Second Street view corridor.

Impacts

San Francisco has no formally adopted significance criteria regarding visual quality and urban design. However, the project would have a significant effect if it would:

- Substantially degrade or obstruct publicly accessible scenic views;
- Substantially degrade the existing visual character or quality of the area, or result in a substantial, demonstrable negative aesthetic effect; or



Source: Square One Productions

PROJECT SITE—VIEW LOOKING SOUTH FROM 2ND AND HOWARD STREETS FIGURE 10



Source: Square One Productions

PROJECT SITE—VIEW LOOKING NORTH FROM 2ND AND FOLSOM STREETS FIGURE 11

- Generate obtrusive light or glare that would adversely affect views or substantially affect other properties.

The proposed project would result in a visual change, since it would demolish seven existing one- to two-story industrial buildings on Second and Clementina Streets and construct one substantially larger seven-story building that would add three stories to the adjacent four-story warehouse on Second and Tehama Streets. The height and bulk of the proposed building would be less than that of many other buildings existing or proposed for construction in the immediate vicinity. Figures 12 and 13, pages 33 and 34, illustrate the proposed building in the context of other large buildings proposed for the area.

The proposed 17-story, approximately 162-foot-high hotel to the south and uphill from the project, between Clementina and Second Streets, would be nearly twice as high as the proposed project.

The approximately 182-foot-high residential condominium directly west of the project across Second Street would be nearly 100 feet higher than the project. The proposed project would be taller than the office buildings directly north of the project site, although it would be comparable in bulk to these buildings.

The project would feature a seven-story glass curtain wall at the entrance, and would be designed to be compatible with the surrounding buildings in the area. An approximately 3,230-square-foot plaza would be constructed on the corner of Second and Clementina Streets, next to the main entrance of the building.

Given that the project would be within a group of nearby buildings that would be higher and generally comparable in bulk, it can be concluded that the project would not result in a substantial or demonstrable negative aesthetic effect and that it would not substantially degrade the existing visual character of the site and its surroundings. Decision makers who will consider whether to approve or disapprove the proposed project, will review the proposed design further, and may nonetheless request changes in height, massing, materials, or other design elements.

The project would be constructed within an increasingly densely built urban area. Views of the project site from Second, Tehama, and Clementina Streets and surrounding areas would be



Source: Square One Productions

PHOTOMONTAGE—VIEW LOOKING SOUTH FROM 2ND AND HOWARD STREETS FIGURE 12



Source: Square One Productions

PHOTOMONTAGE—VIEW LOOKING NORTH FROM 2ND AND FOLSOM STREETS FIGURE 13

altered by construction of the project. Although the additional height would be visible from surrounding buildings, the project would not obstruct any scenic views currently enjoyed from public open spaces, and would not substantially affect views from other locations.

The project would comply with Planning Commission Resolution No. 9212, which prohibits the use of mirrored or reflective glass. The project sponsor would also not include exterior lighting in excess of amounts common and accepted in urban areas. The project would not, therefore, generate obtrusive light or glare substantially impacting other properties.

C. HISTORIC ARCHITECTURAL RESOURCES

Setting

The project site contains eight buildings (seven of which are interconnected at the basement and first floors) that were constructed over a period of 38 years from 1912 to 1950. The buildings are part of a cluster of small-scale, post-fire buildings on the block bounded by First, Second, Folsom, and Howard Streets, in the South of Market Area.

There are a number of surveys and lists of San Francisco structures that are considered to have attained a degree of architectural, historical, and or contextual importance. These surveys are described further below, along with their findings with regard to structures on or near the project site.

Article 10 of the *San Francisco Planning Code* identifies formally designated city landmarks and locally designated historic districts. Of the eight buildings located on the project site, none is listed under Article 10 as a Landmark, and none is located within a locally designated Historic District. The project site is three blocks north of the locally designated South End Historic District, which was found to be significant for "The development of warehouses over a 120-year period [that] provides a benchmark from which to view architectural and technological responses to the rapid changes of a growing industrial nation, state, and city."

Article 11 of the *Planning Code* identifies significant buildings in the C-3 Zoning Districts within four Categories, I through IV. Category I and Category II structures are Buildings of Individual Importance, are at least 40 years old, are rated Excellent in Architectural Design or Very Good in both Architectural Design and Relationship to the Environment. "Contributory Buildings" are

Category III and Category IV buildings, and most fall within designated Conservation Districts. Category V buildings and unrated buildings are not considered significant by Article 11. No buildings on the site are Identified in Article 11, and the site is not included within the boundaries of a Conservation District.

Between 1974 and 1976, the Planning Department conducted a citywide inventory of San Francisco's approximately 143,000 structures to determine their architectural importance. Both contemporary and older buildings were surveyed, but historical associations were not included. An advisory review committee of architects and architectural historians determined that 10,000 of these 143,000 buildings were eligible for inclusion in the completed inventory based upon various factors including architectural design, urban design context, and overall environmental significance. Cumulatively these buildings represent approximately six percent of the City's entire building stock. These buildings are rated from a low of "0" to a high of "5"; a rating of "0" indicates contextual importance - a 5 indicates great importance. Approximately 2,800 of these buildings (two percent of the city's total buildings) rated "3" or better. None of the existing buildings on the project site were rated in this inventory.

In response to a rash of demolitions occurring in the downtown during the high-rise office building boom of the late 1960s and 1970s, the Foundation for San Francisco's Architectural Heritage funded a survey of the downtown area. Using criteria developed by Canadian architectural scholar Harold Kahlman, the buildings were rated for architecture, history and environmental context. Buildings that had been altered beyond recognition, or buildings built after 1945 were precluded from listing. The survey included 790 parcels within the C-3-0 Zoning District. Surrounding this Zoning District were four secondary survey areas: south of Market - east, south of Market - west, the Tenderloin, and Nob Hill. The secondary areas contained several thousand parcels, so only those buildings with obvious visible merit were included. The project site is located in the south of Market - east Secondary Survey area. None of the buildings on the project site were included in the Heritage Survey.

Following the Loma Prieta earthquake of 1989, the Landmarks Board compiled an inventory of unreinforced masonry buildings (UMBs). Entitled *A Context Statement and Architectural/Historical Survey of UMB Construction in San Francisco, 1850-1940*, the study lists some 2,007 structures. In 1992, responding to a mandate by the State of California, the San Francisco Board of

Supervisors required that UMB owners either strengthen or demolish these buildings which are fragile and dangerous in an earthquake. The *UMB Survey* rated very few buildings and primarily compiled a table that documented ratings that already existed for the UMB buildings. None of the buildings on the project site are listed in the *UMB Survey*.

No listing for any buildings on the subject property were found in *Here Today* or Area Plans of the *General Plan*.

No buildings on the project site are listed on the National Register of Historic Places. However, the project site was included in three inventories previously reviewed for eligibility for inclusion on the National Register by the SHPO (State Historic Preservation Officer). In 1983, an Historic Architectural Survey Report (HASR) was prepared as part of the Historic Properties Structures Report (HPSR) for the *SF-I-280 Freeway Transfer Concept Program*. None of the buildings on the project site were determined by this study to be individually eligible for listing on the National Register. An HASR prepared in 1994 for the *Alternatives to Replacement of the Embarcadero Freeway and Terminal Separator Structure* also included the project site. The Haas Woodworking building at 64 Clementina Street (Lot 60) was determined in that study to be eligible for listing on the National Register. A subsequent 1997 Historic Property Survey Report (HPSR) prepared for the proposed Caltrain extension project reaffirmed the 64 Clementina Street building's eligibility for listing on the National Register. The findings of that report are summarized in more detail in the following paragraph:

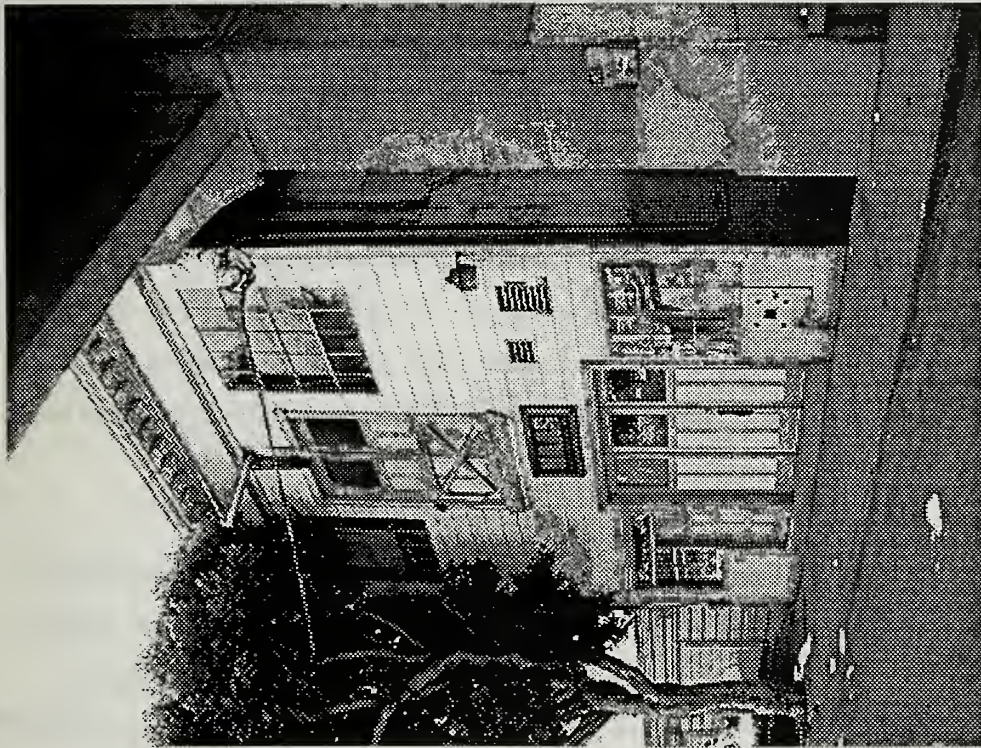
"This simple two story, flat-roofed wood frame building. . . appears to be in nearly original condition. Not an actual pre-quake survivor, it is a reconstruction of a similar building that occupied this site before 1906, as seen in period photographs. This building is an example of structure[s] completed during the city's second most important historic period, the post-quake reconstruction of 1906-13. It was built to house waterfront related businesses and services which dominated the port area of the city from the 1850s and beyond. The building derives its significance from its ability to remind us of how previous generations lived during this nearly-vanished period of our urban history. Of significantly diminished integrity, this marginally intact example of San Francisco's immediate post-fire reconstruction is typical of hundreds which were built, usually to the lot-line, often on existing foundations, to house waterfront related businesses and activities. Many were later demolished to accommodate the construction of the elevated Embarcadero skyway, leaving buildings such as this, as rare surviving examples of the city's turn-of-the-century waterfront. Its distinguishing characteristics include its Victorian-era style, small scale, and timber construction, all of which were originally thought to qualify the building for listing on the National Register under criterion "A" for its association with those events which have made a significant contribution to the broad patterns of our history."¹

As a result of the determination regarding National Register eligibility achieved through the SHPO's concurrence with the cited evaluations, the building at 64 Clementina Street was considered listed on the California Register of Historic Resources. Subsequent to the 1997 evaluation and SHPO concurrence, the building owner submitted historical photographs and building permits to the State Historical Resources Commission demonstrating that there had been many alterations to the building over time (see Figure 14, page 39). According to this documentation, early alterations occurred in 1920, 1932 and 1937 after fire damage. Late period alterations occurred due to the modernization of the building's exterior and to prevent future fire hazards. The building's elevations currently feature corrugated metal siding on all outside walls, asbestos siding on the front facade, metal window framing, construction of a new doorway in the place of one of the original wood framed windows on the first floor, removal of the wood balcony from the front facade of the buildings, and removal of wood ornamentation elements from the roof of the buildings. The original wood siding, original wood balcony, original wood frame windows, and original wood ornamentation elements have been removed from the building.

On August 6, 1999, based upon the analysis cited above, the State Historical Resources Commission voted to remove the Hass Woodworking Building from listing in the California Register, based upon its loss of architectural integrity.² As a result of this loss of integrity and Commission's action, the building is not considered a historical resource for CEQA purposes.

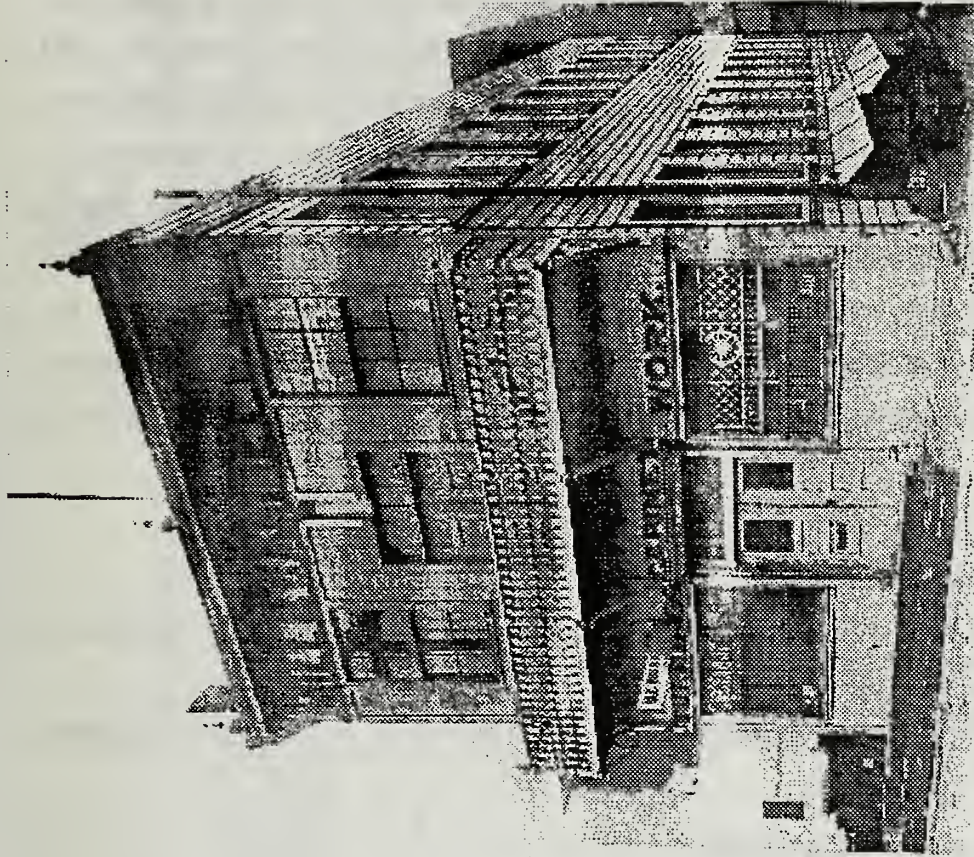
Impacts

CEQA Section 21084.1 states that "a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." A "historical resource" is defined as one that is listed in, or determined eligible for listing in, the California Register of Historical Resources. In addition, a resource that (i) is identified as significant in a local register of historical resources, such as Article 10 and Article 11 of the *San Francisco Planning Code*, or (ii) is deemed significant due to its identification in an historical resources survey meeting the requirements of *Public Resources Code* Section 5024.1(g), is presumed to be historically significant unless a preponderance of evidence demonstrates otherwise. A "substantial adverse change" is defined by CEQA Guidelines Section 15064.5 as "demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resources would be materially impaired."



Current Principal Facade

Source: Patrick McGrew, Architectural Historian



Original Building, circa 1913

CURRENT AND HISTORIC VIEWS OF 64 CLEMENTINA FIGURE 14

The proposed project calls for the demolition of the 64 Clementina Street building and the other structures to the west on Clementina up to Second Street (70 - 80 Clementina and 251 - 261 Second Street). Only the building at 64 Clementina Street appears in any surveys of the area, and none of the buildings have any local status as Landmark buildings or contributors to a historic district or conservation district. The building at 64 Clementina has been altered extensively since its original construction, and upon consideration, the State Historical Resources Commission found that it fails to retain sufficient integrity to be considered eligible for the California Register of Historical Resources. For these reasons, the building is not considered an historical resource, and the demolition of the building would not be considered a significant adverse impact.

NOTES - Historic Architectural Resources

¹ Patrick McGrew, Architect AIA, *Background Study and Analysis: Buildings Located Within 235 Second Street Project Area, San Francisco, California*, September 21, 1999.

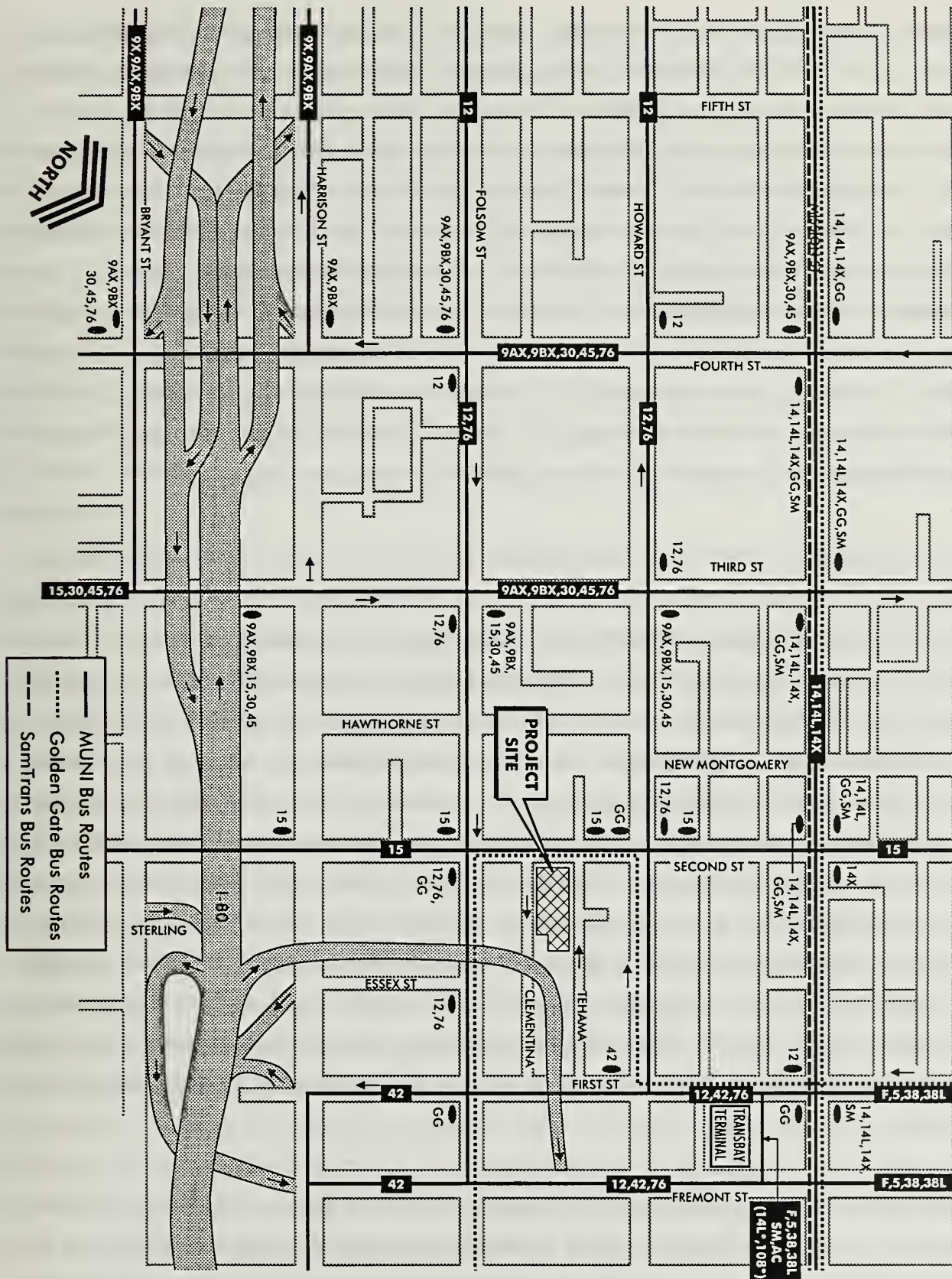
² Ibid.

D. TRAFFIC AND CIRCULATION¹

Setting

The project site is within an area of the City that is subject to traffic congestion during the afternoon commute, including the "PM peak hour," which is the hour of heaviest traffic volumes and which typically occurs between 4:30 p.m. and 5:30 p.m. In particular, streets leading to the Bay Bridge on-ramps, including First Street, Harrison Street, Bryant Street and Folsom Street are congested, and drivers experience long delays in reaching the on-ramps (Figure 15, page 41). Drivers heading for I-80 westbound/U.S. 101 southbound also experience congestion and delays, particularly around the on-ramp at Fourth and Harrison Streets. Conditions on the I-80 freeway typically are also congested, with the worst congestion eastbound occurring near the Sterling Street on-ramp (near Second and Bryant Streets) and westbound, between Fifth Street and the U.S. 101 junction (just west of Ninth Street).²

Within the project vicinity, Mission and Third Streets and portions of Harrison and Bryant Streets are designated in the Transportation Element of the San Francisco General Plan as Transit Preferential Streets. On these streets, priority is given to transit vehicles over autos during



Source: Wilbur Smith Associates

EXISTING TRANSIT SERVICE AND STOP LOCATIONS FIGURE 15

commute and business hours on weekdays, usually along curbside lanes. Howard, Folsom, Harrison, Bryant, and Third Streets are designated in the Transportation Element as Major Arterials, which the General Plan defines as “cross-town thoroughfares whose primary function is to link districts within the City and to distribute traffic from and to the freeways.” Mission Street is part of the Citywide Pedestrian Network, and Mission, First (between Market and Howard), Second, and Third Streets (between Market and Harrison) are Neighborhood Commercial Pedestrian Streets. Second Street (Route 11) and Howard and Folsom Streets (Route 30) are designated as Citywide Bicycle Routes in the Transportation Element. Folsom Street has a separate bicycle lane in the vicinity of the project, but most of the other bicycle routes are Class III routes, meaning bicyclists and motorists share the curb lane width. All major intersections in the vicinity of the project site are traffic signal controlled; minor intersections, including Tehama Street at Second Street, typically have stop signs only on the minor streets.

Mission and Second Streets have two travel lanes in each direction, except that Second has one northbound lane between Mission and Market Streets; the right lanes on both sides of Mission Street are transit-only lanes. Howard and Folsom streets are generally one-way four-lane arterials, with travel in the westbound and eastbound directions, respectively. However, east of Fremont Street, Howard has two travel lanes in each direction and east of Main Street Folsom has one westbound lane. Bryant Street is a one-way arterial eastbound with four travel lanes; it is the primary route for vehicles exiting the eastbound I-80 Fourth Street off-ramp to the project area. In the vicinity of the project, Harrison Street is a two-way east-west arterial east of Third Street and a one-way westbound arterial west of Third Street. First Street is a one-way southbound street (part of a couplet with Fremont Street, which is one-way northbound), with three travel lanes; between Market and Howard Streets, one lane is reserved for transit vehicles only. Third Street is a major one-way northbound arterial with five travel lanes south of Folsom Street and six lanes north of Folsom. Parking is generally permitted on both sides of each of the streets described above, but is restricted on Mission, Howard, First, and Third Streets in the peak hours.

Currently, stops for approximately 15 MUNI bus lines are within walking distance (considered one-quarter of a mile) of the project. BART is less than one-third of a mile north of the site, at the Second Street entrance to the Montgomery station. AC Transit, SamTrans, and Golden Gate

Transit are approximately one block east of the site, at the Transbay Transit Terminal. Caltrain is available at the Fourth/Townsend depot via a connecting MUNI line.

Surveys of existing publicly available off-street parking capacity and occupancy were taken in the area bounded by Market, Harrison, Beale, and First Streets. There are approximately 9,591 parking spaces within the study area, with mid-afternoon weekday occupancy levels at about 88 percent. On-street parking in the project area is effectively near capacity. Based on field observations during the midday peak period, pedestrian flows in the project area are generally “unimpeded,” indicating that pedestrians generally have freedom to select the speed and direction of movement, with an absence of physical conflicts and only minor interaction with other pedestrians. Pedestrian flows along Second Street are moderate to high—approximately 200 to 400 pedestrians per hour—but both sidewalk and crosswalk operating conditions are unconstrained.

Impacts

While the City has no formally adopted significance criteria for transportation issues, the City’s long-standing practice is to consider that a project will have a significant effect on the environment if it would cause a signalized intersection to deteriorate to an unacceptable level of service (i.e., from LOS D or better to LOS E or F), substantially increase delay at an intersection already operating at LOS E or F, interfere with existing transportation systems causing substantial alteration to circulation patterns or causing major traffic hazards, or contribute substantially (“considerably”) to cumulative traffic increases that cause intersection operations to deteriorate to unacceptable levels. The project would also be considered to have a significant effect if it would cause a substantial increase in transit demand that cannot be accommodated by existing or proposed transit capacity, resulting in unacceptable levels of transit service, or substantially interfere with existing transit services. Regarding parking, the *San Francisco General Plan* policies emphasize the importance of public transit use and discourage the provision of facilities that encourage automobile use. As a policy matter and because of the high level of transit accessibility in San Francisco, the creation of or increase in parking demand resulting from a proposed project that cannot be met by existing or proposed parking facilities would not itself be considered a significant effect. The project would be considered to have a significant effect if it were to result in substantial pedestrian overcrowding, create particularly hazardous conditions for pedestrians or bicyclists, or otherwise substantially interfere with

pedestrian and bicycle accessibility. Generally, construction-period transportation impacts would not be considered significant because they would be temporary.

Project-specific impacts are described here, as are projected cumulative impacts for the year 2015, based on analysis for the Transbay Study Area, generally bounded by Market, Spear, Bryant, and Third Streets.³ Because the project vicinity includes a number of projects that are currently under construction, under review, or already approved but not yet built, this analysis also describes cumulative impacts for conditions that are anticipated to exist in the project vicinity if all of these projects are completed. Although there is no definitive time frame for completion of the projects currently under construction, approved, or under review, this interim cumulative analysis assumes that they would be completed by 2005.

TRAVEL DEMAND ANALYSIS

Based on the City's standard trip generation rates and survey data, the project would generate about 3,859 net new daily person trips per day, with a total of about 263 net new person trips during the p.m. peak hour, of which about 60 would be vehicle trips,⁴ 142 would be transit trips, and 41 would be made by walking, bicycles, taxis, or motorcycles.⁵ The project sponsor would be required, under *Planning Code* Section 163, to provide transportation management and transportation brokerage services, thereby potentially helping reduce project vehicle trip generation through such means as provision of ridesharing and transit information and on-site sale of transit passes.

TRAFFIC IMPACTS

Based on surveys of trip origins and destinations by downtown workers, of the 60 net new p.m. peak-hour vehicle trips generated by the project, about 57 percent would be destined for locations within San Francisco, while the remainder would be headed for the East Bay, the Peninsula/South Bay, and the North Bay. East Bay-bound vehicles would make up approximately 20 percent of the vehicle trips, or about 12 additional cars heading for the East Bay (assumed to be via the Bay Bridge) in the p.m. peak hour. These 12 additional cars would incrementally contribute to the substantial queuing that currently occurs on access routes to the Bay Bridge, such as First Street. Peninsula/South Bay-bound traffic would amount to about eight new vehicles, which likewise would incrementally contribute to queuing that now occurs at southbound access routes, such as the on-ramp at Fourth and Harrison Streets. Of the four

signalized intersections studied (Second/Howard, Second/Folsom, First/Howard, and First/Folsom), only two currently operate at acceptable (LOS D⁶ or better) service levels during the p.m. peak hour, while the intersection of First and Howard Streets operates at LOS E and the intersection of First and Folsom Streets operates at LOS F, largely due to heavy volumes on First Street heading towards the Bay Bridge (see Table 1 below). Critical movements at the unsignalized intersection of Second and Tehama Streets (left-hand turns from westbound Tehama onto Second Street) currently operate at acceptable levels (LOS C).

Table 1
Existing Intersection Levels of Service
Weekday P.M. Peak Hour

| Intersection | Control | Delay (sec./veh.) | LOS |
|--|------------|----------------------|-----|
| Second Street/Howard Street | Signalized | 15.1 | C |
| Second Street/Folsom Street | Signalized | 31.3 | D |
| First Street/Howard Street | Signalized | 41.2 | E |
| First Street/Folsom Street | Signalized | >60 | F |
| Second Street/Tehama Street ¹ | 2-way STOP | 19.2 | C |

Notes

¹ For unsignalized intersections, delay and LOS are presented for worst approach, which is the westbound approach.

Source: Wilbur Smith Associates, August 1999

The addition of project traffic would result in some increase in average vehicle delay at the five study intersections. As shown in Table 2 on the following page, the level of service at the signalized intersection of Second/Howard and the unsignalized Second/Tehama intersection would deteriorate from LOS C to LOS D. The LOS at all other intersections would remain unchanged. At the intersection of First/Folsom, which currently operates at LOS F conditions, the proposed project would add about four vehicles to the existing PM peak-hour traffic volumes. This increase in vehicles would not substantially affect the vehicle delays at this intersection. The intersections described above were selected for analysis because they would be the most likely to be affected by project traffic. However, project-generated vehicles would also travel through other intersections, including some that currently operate at unacceptable levels of service, such as First and Harrison Streets and Fourth and Harrison Streets, and perhaps others. Project traffic would have less impact on intersections farther from the project site, as vehicles would tend to disperse as they travel away from the site.

Table 2
Existing Plus Project Intersection Levels of Service
Weekday P.M. Peak Hour

| Intersection ¹ | Existing | | Existing Plus Project | |
|-----------------------------------|--------------------|-----|-----------------------|-----|
| | Delay ¹ | LOS | Delay | LOS |
| Second Street/Howard Street | 15.1 | C | 28.4 | D |
| Second Street/Folsom Street | 31.3 | D | 32.8 | D |
| First Street/Howard Street | 41.2 | E | 41.8 | E |
| First Street/Folsom Street | >60 | F | >60 | F |
| Second Street/Tehama ² | 19.2 | C | 22.7 | D |

Notes

¹ Delay = average delay per vehicle in seconds.

² For the unsignalized intersection of Second/Tehama, delay and LOS are presented for the worst approach (westbound)

Source: Wilbur Smith Associates, August 1999.

Table 3
Intersection LOS Operating Conditions Existing and 2015 Cumulative
Weekday P.M. Peak Hour

| Intersection | Existing | | Existing Plus Project | | 2015 Cumulative | |
|------------------------------------|--------------------|-----|-----------------------|-----|--------------------|-----|
| | Delay ¹ | LOS | Delay ¹ | LOS | Delay ¹ | LOS |
| Second Street/ Howard Street | 15.1 | C | 28.4 | D | >60 | F |
| Second Street/ Folsom Street | 31.3 | D | 32.8 | D | >60 | F |
| First Street/ Howard Street | 41.2 | E | 41.8 | E | >60 | F |
| First Street/ Folsom Street | >60 | F | >60 | F | >60 | F |
| Second Street/ Tehama ² | 19.2 | C | 22.7 | D | 40.2 | E |

Notes

¹ Delay = average delay per vehicle in seconds.

² For unsignalized intersection of Second/Tehama LOS and delay is presented for worst movement which is the westbound approach.

Source: Wilbur Smith Associates, August 1999.

Future cumulative traffic volumes during the weekday p.m. peak hour, including those associated with the proposed project, were projected for the year 2015 and were based on a 1 percent annual growth rate between 1999 and 2015, representing a 17-percent overall growth rate. Under future Year 2015 conditions, all of the study intersections would operate at unacceptable levels of service. The four signalized intersections (Second/Howard, Second/Folsom, First/Howard, and First/Folsom) would experience p.m. peak-hour delays in excess of 60 seconds and would operate at LOS F, while the unsignalized intersection of Second and Tehama Streets would operate at LOS E, with an average delay of 40.2 seconds per vehicle waiting to exit from Tehama onto Second Street (see Table 3 on the previous page). While project-generated traffic would incrementally contribute to these conditions, the conditions would primarily be the result of existing congestion approaching the I-80 eastbound and westbound on-ramps combined with future cumulative development. Projected congestion levels could be somewhat less if planned measures to enhance transit service and encourage the use of alternate means of transportation are successful. Similarly, congestion levels in the area could be somewhat greater if the capacity of street segments is reduced or if the rate at which vehicles can enter the freeway is reduced.

At the signalized study intersections, the proposed project-generated traffic would represent less than 1 percent of total year 2015 volumes, and between about 1 and 8 percent of the cumulative growth in traffic volumes between Existing and 2015 conditions. The proposed project's contribution to cumulative traffic conditions would not be considerable, and would not result in a significant effect on the environment.

In order to evaluate the combined effects of a number of recent development projects in the Transbay Area, an Interim Year analysis was performed for traffic and transit conditions.⁷ The analysis included some of the large projects currently undergoing the environmental review process, along with other projects that are already under construction or have recently been entitled. These projects provide a reasonable, conservative estimate of growth that may occur in a similar time frame as the proposed project. If constructed, these projects would result in a net increase of more than 3 million sq. ft. of office space, 70,000 sq. ft. of retail space, more than 400 hotel rooms and more than 800 residential units in the Transbay Area. While a precise year when all of these projects would be built and occupied cannot be established, the year 2005 was identified as a reasonable representation of these interim year conditions.

By year 2005, existing traffic volumes at selected Transbay Area screenlines would increase between 2 and 15 percent, although volume increases in the vicinity of the proposed project may be greater. In general, traffic operating conditions at the study intersections would be better under Interim Year conditions than under the 2015 Cumulative conditions. Two intersections are common to the proposed project impact analysis and the Transbay Area Interim Year analysis: First/Howard and Second/Howard. In the Interim Year analysis, First/Howard is identified as improving from LOS E under existing conditions to LOS C under Interim Year conditions. This improvement in operating conditions is due to the inclusion in the Interim Year analysis of an additional travel lane on First Street that was proposed as part of the Alternatives to Replacement of the Embarcadero Freeway and the Terminal Separator Structure.⁸ [Based on discussions with Department of Parking and Traffic (DPT), it is unclear whether this additional capacity will be provided on First Street, and it therefore was not assumed in the proposed project's analysis of future year 2015 conditions.⁹] At the intersection of Second/Howard, traffic operating conditions would be LOS C. As noted above, during the PM peak hour, the proposed project would add about four vehicles to the intersection of First/Howard and about 29 vehicles to the intersection of Second/Howard. This contribution of the proposed project traffic to Interim Year conditions would not be significant.

TRANSIT

The project would generate approximately 142 net new p.m. peak-hour transit trips. Of these trips, about 79 would be on MUNI, and would be dispersed over more than 15 MUNI routes that serve the project area. While the proposed project would incrementally increase p.m. peak-period transit ridership, capacity utilization¹⁰ on the four MUNI screenlines (which are imaginary cordon lines drawn around the greater downtown area for purposes of analyzing MUNI ridership by corridor) would remain unchanged, with a maximum of 81 percent on the Southwest screenline. The project would be subject to the Transit Impact Development Fee, which is a one-time fee assessed against downtown office projects to offset increased capital costs to MUNI to provide additional capacity to serve the increased demand from new development.

Project ridership on regional carriers would total about 53 (some riders would also take MUNI), with about 65 percent traveling to the East Bay on BART, and another 12 percent on AC Transit. Project transit trips would not increase capacity utilization on any of the regional transit carriers. Although BART to the East Bay would operate at over 120 percent of capacity during the weekday p.m. peak hour, the three-hour load factor would be 112 percent, slightly less than the standard of 115 percent.

By 2015, absent increased MUNI service, overall p.m. peak-hour ridership across the four screenlines would increase to 105 percent of capacity. Ridership at three of the screenlines would exceed 100 percent of capacity, with the southwest screenline being the most crowded, at 119 percent. Only the northeast screenline, at 78 percent, would have adequate capacity. Trips generated by the proposed 235 Second Street project would represent about 0.7 percent of the projected cumulative increase in MUNI ridership between 1999 and 2015, and would not substantially affect the peak-hour capacity utilization of each screenline.

Regional transit ridership is expected to increase by about 10,600 passengers between Existing and Year 2015 Cumulative conditions, with overall capacity utilization increasing from 93 percent to 104 percent. With the exceptions of East Bay-bound BART trains and AC Transit buses, whose utilization with cumulative ridership would increase to 126 percent and 135 percent, respectively, all other regional carriers would be below maximum capacity. However, Caltrain service to the South Bay would be approaching capacity, at 97 percent utilization, and SamTrans service to the South Bay would exceed 92 percent. BART's three-hour load factor for its East Bay-bound service would operate at 114 percent, slightly less than the agency's 115 percent standard. Assuming that BART implements current plans to increase transbay service from 18 trains per hour to 27 trains per hour by 2006, p.m. peak-hour capacity would increase by 50 percent, and BART would have more than adequate capacity to accommodate the increase in ridership generated by cumulative projects.¹¹ Although AC Transit proposes service improvements in Transbay routes, the changes would not have a major effect on capacity and ridership and overcrowded conditions would result from anticipated continued growth in demand.

Because of the relatively limited effect of the project in the context of long-range cumulative growth, the conditions in 2015 would occur with or without the project, and the project contribution would be less than 1 percent of cumulative transit ridership. The project would therefore not have a significant impact on transit services and capacity.

With respect to Interim Year 2005 conditions, adequate capacity exists on the MUNI lines serving the Transbay Area to accommodate the new transit demand generated by the development anticipated to be completed by 2005. Use of regional transit would increase due to the additional trips, but would be lower than that shown for 2015. With the exception of BART to the East Bay, regional carriers would have adequate capacity to handle the interim year growth. BART's performance standard for the three-

hour period would be exceeded by 2005. BART has planned capacity increases that would be able to accommodate the additional growth, although somewhat after 2005. These planned capacity increases would accommodate the anticipated demand under 2015 Cumulative conditions.

PARKING

The proposed project is in the C-3-O (Downtown Office) zoning district, in which off-street parking is not required for commercial uses. The project would include about 50 off-street parking spaces, including two handicapped-accessible spaces. The project would create long-term parking demand for about 187 spaces and short-term parking demand for about 28 equivalent daily spaces, for a total parking demand of about 215 spaces. Given the provided 50 spaces, there would be a shortfall of 165 spaces. Drivers not accommodated within the project parking facilities would need to park elsewhere in the study area or switch to transit or other forms of travel.

Off-street parking facilities in the study area are generally full, with an overall capacity of 88 percent. As a result, drivers may have difficulty finding alternative parking accommodations, and may be forced to park far away from their destination. For this reason and because the site is accessible to a wide variety of transit services, employees and visitors to the site on a regular basis would likely consider travelling to the site via modes other than private automobile.

LOADING

Under Planning Code Section 152.1, the project would be required to provide three off-street (standard truck) freight loading spaces. The project would provide three Code-complying standard truck loading spaces at grade in a loading dock accessed from Clementina Street.

The project would generate a total of about 70 service vehicle stops per day.¹² Calculated average hourly loading demand would be about three spaces, and peak demand would be about four spaces. The project's three full loading spaces would be able to accommodate both average and peak demand, provided that two large (i.e., greater than 30 feet in length) trucks do not attempt to load at the same time (it is expected that vans and pick-up trucks would comprise the majority of truck trips to the site). A 30-foot single unit truck and a 50-foot semi truck would be able to back onto the loading dock from the travel lane without substantial difficulty. The 50-foot semi truck, however, would be only be able to pull into the west side of the dock. A 55-foot tractor trailer would not be able to access the loading dock. The project sponsor has indicated that they would not require the use of a delivery truck more

than 50 feet in length at any time.¹³ Therefore, project impacts related to loading would not be significant.

PEDESTRIAN AND BICYCLE CONDITIONS

The primary pedestrian access for the project would be on Second Street, with secondary access from Clementina Street via the proposed plaza. During the p.m. peak hour, the proposed project would add about 183 (142 transit and 41 walk/bicycle/other) pedestrian trips. Based on the likely dispersion of pedestrian activity among the walkways to transit stops/stations, retail establishments, and other facilities in the project vicinity, conditions on the sidewalks and crosswalks adjacent to the building following the addition of project pedestrian travel, would be expected to remain similar to existing “unimpeded” conditions. Therefore, the project would not result in any significant impacts with regard to pedestrians.

There are designated Citywide Bicycle Routes in the project vicinity (on Second, Folsom, and Howard Streets). The project would not be expected to generate a noticeable increase in bicycles in the area, nor would it be expected to noticeably affect existing bicycle conditions in the area. The project would provide bicycle parking and shower and locker facilities, as required by Planning Code Sections 155(j), 155.2, and 155.3. Therefore, the project would not result in any significant impacts regarding bicycles.

CONSTRUCTION IMPACTS

During the projected 18-month construction period, temporary and intermittent traffic and transit impacts would result from truck movements to and from the project site. Construction staging would occur primarily within the site; other staging areas may be identified in consultation with City staff. The greatest number of trucks traveling to and from the site would occur during the excavation phase of construction, with about 40 to 50 trucks per day traveling to and from the site. Truck movements during periods of peak traffic flow would have greater potential to create conflicts than during non-peak hours because of the greater numbers of vehicles on the streets during the peak hour that would have to maneuver around queued trucks; these effects could be reduced by the project sponsor requiring construction truck traffic to be restricted to non-peak hours, as approved by the DPT. The reduction in capacity would also slow the movement on Second Street of southbound MUNI buses on the 15-Third line. As mitigation, the project sponsor could meet with MUNI, DPT, and other responsible City agencies and other project construction managers in the area to coordinate construction activities so as to minimize construction impacts on vehicular and pedestrian traffic. The sidewalks adjacent to the site on Tehama and Clementina Streets would likely be closed during portions of project construction, as

may a portion of the sidewalk on Second Street. A protected pedestrian walkway would be provided in the curb lane to accommodate passing pedestrians. Although there would be a temporary increase in parking demand by construction workers, they would either park on-site or on the streets adjacent to the site. Construction impacts would be temporary, and would not be significant.

NOTES - Traffic and Circulation

¹ This section is based on the transportation study, *235 Second Street Transportation Study*, prepared by Wilbur Smith Associates, October 5, 1999. This report is available for review at the San Francisco Planning Department, 1660 Mission Street, as part of Project File No. 99.176E.

² Mission Bay Final Supplemental EIR (Case No. 96.771E), p. V.E.7.

³ Korve Engineering, *Transbay Redevelopment Area Plan EIR Transportation Study*, Final Report, April 1998. This report is available for review at the Planning Department, 1660 Mission Street.

⁴ The 57 vehicle trips represent 76 person trips by vehicle; the number of vehicle trips is less than the number of person trips by vehicles because some person trips are made in vehicles carrying more than one person.

⁵ Travel demand for the proposed project was calculated on the basis of trip generation rates and p.m. peak-hour percentage of daily traffic for Office, Distribution, and Manufacturing uses presented in the San Francisco Planning Department's *Guidelines for Environmental Review: Transportation Impacts* (Appendices 1 and 2).

⁶ Traffic operations are characterized using a p.m. peak-hour level of service (LOS) analysis, which provides a standardized means of rating an intersections' operating characteristics on the basis of traffic volumes, intersection capacity, and delays. LOS A represents free-flow conditions, with little or no delay, while LOS F represents congested conditions, with extremely long delays; LOS D (moderately high delays) is considered the lowest acceptable level in San Francisco.

⁷ Results of the Transbay Area Interim Year analysis are documented in technical memoranda *Interim Year Traffic Analysis for Transbay Redevelopment Area*, June 19, 1999, Korve Engineering, Inc.; *Transbay Interim Year MUNI and Regional Transit Screenline Analysis*, May 20, 1999, Wilbur Smith Associates; *Transbay Interim Year Parking Analysis*, June 3, 1999, Pittman & Hames Associates, available at the San Francisco Planning Department (located at 1660 Mission Street, San Francisco CA).

⁸ *Alternatives to Replacement of the Embarcadero Freeway and Terminal Separator Structure Final EIS/EIR*, September 1996 (Case No. 92.202E & 94.060E).

⁹ Telephone conversation between Jack Fleck, SF DPT and Luba Wyznyckyj, WSA, June 10, 1999.

¹⁰ Capacity utilization is the aggregate number of passengers divided by the aggregate design capacity of the transit vehicles, and may include varying numbers of standees, depending on the transit carrier.

¹¹ Future capacity increases for East Bay BART service are identified in the *1996 BART Short-Range Transit Plan*, as described in the *Mission Bay Final Supplemental EIR* (Case No. 96.771E), p. V.E.86. This report is available for review at the San Francisco Planning Department, 1660 Mission Street.

¹² Based on the Planning Department's *Guidelines for Environmental Review: Transportation Impacts*, Appendix 7.

¹³ Letter to Deborah Oxendine, Williams-Sonoma, Inc., to Luba Wyznycky (included in *235 Second Street Transportation Study*, October 5, 1999).

E. GROWTH INDUCEMENT

In general, a project would be considered growth-inducing if its implementation would result in substantial population increases and/or new development that might not occur if the project were not approved and implemented. The proposed new/expanded building would increase the amount of office space currently existing on the project site and would replace warehouse and distribution space with a smaller amount of production and light manufacturing space. These changes in use and increase in commercial space on the site would not be expected to substantially alter development patterns in downtown or elsewhere in San Francisco. As a single new building replacing existing buildings and commercial uses, the project would not generate substantial population growth or concentration in the neighborhood, City, or region. It would not introduce new, additional housing into the project area or neighborhood. Located in an urban area, the project would not necessitate or induce the extension of municipal infrastructure. In view of the above, there is no reason to believe that the project would result in additional development in the project site vicinity that would not otherwise occur.

IV. MITIGATION MEASURES PROPOSED TO MINIMIZE SIGNIFICANT IMPACTS OF THE PROJECT

In the course of project planning and design, measures have been identified that would reduce or eliminate potentially significant environmental impacts of the proposed project. All of these measures have been voluntarily adopted by the project sponsor or project architects and contractors and are thus proposed as part of the project. Mitigation measures preceded by an asterisk (*) are from the Initial Study (see Appendix A).

Several other measures are required by law and are summarized elsewhere in the text for informational purposes. These measures include: no use of mirrored glass on the building in order to reduce glare, as per City Planning Commission Resolution 9212; limitation of construction-related noise levels, pursuant to the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code, 1972); implementation of geotechnical assessment and recommendation; and observance of State and Federal Occupational Safety and Health Administration requirements related to handling and disposal of hazardous materials. Measures required by law are not considered mitigation measures and do not appear in this chapter.

A. CULTURAL RESOURCES

- *● Should evidence of archaeological resources of potential significance be found during ground disturbance, the project sponsor would immediately notify the Environmental Review Officer (ERO), and would suspend any excavation which the ERO determined could damage such archaeological resources. Excavation or construction activities which might damage cultural resources would be suspended for a total maximum of four weeks over the course of construction.

After notifying the ERO, the project sponsor would select an archaeologist to assist the Office of Major Environmental Analysis in determining the significance of the find. The archaeologist would prepare a draft report containing an assessment of the potential significance of the find and recommendations for what measure should be implemented to minimize the potential effects on archaeological resources. Based on this report, the ERO would recommend specific mitigation measures to be implemented by the project sponsor.

Mitigation measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation, and recovery of the cultural material. Finally, the archaeologist would prepare a report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure would be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report would be sent to the President of the Landmarks Preservation Advisory Board and the California Archaeological Site Survey Northwest Information Center. The Office of Major Environmental Analysis shall receive three copies of the final archaeological report

B. CONSTRUCTION AIR QUALITY

- *● The project sponsor shall require the construction contractor(s) to spray the project site with water during excavation, grading, and site preparation activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other such material; cover trucks hauling debris, soils, sand or other such material; and sweep surrounding streets during these periods at least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor shall require the construction contractor(s) to obtain reclaimed water from the Clean Water Program for this purpose.
- *● The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as prohibiting idling motors when equipment is not in use or when trucks are waiting in queues, and implementing specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

C. HAZARDS

- *● The project sponsor would ensure that the construction contractor limit the amount of excavation, and handle and dispose of any excavated soils properly. Soil excavated for offsite disposal or use shall be characterized for metals and petroleum hydrocarbons based on the requirements of the accepting facility or party; this characterization should be performed on a representative volume of stockpiled soil.
- *● The project sponsor would ensure that building surveys for asbestos, PCB-containing equipment (including elevator equipment), hydraulic oils, fluorescent lights, and lead-based paint are performed prior to the start of demolition. Any hazardous materials so discovered would be abated according to federal, state, and local laws and regulations.

D. TRANSPORTATION

- During the construction period, construction truck movement would be permitted only between 9:00 a.m. and 3:30 p.m. to minimize peak-hour traffic (including transit) conflicts. The project sponsor and construction contractor(s) would meet with the Traffic Engineering Division of the Department of Parking and Traffic, the Fire Department, MUNI, Golden Gate Transit, and the Department of City Planning to determine feasible traffic mitigation measures to reduce traffic congestion, including transit disruption (for example, potential relocation of bus stops), and pedestrian circulation impacts during construction of this project and other nearby projects that are planned for construction or which later become known. To minimize cumulative traffic impacts due to lane closures during construction, the project sponsor would ensure that the construction contractor coordinate with construction contractor(s) for any concurrent nearby projects that are planned for construction or become known.

V. SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

In accordance with Section 21067 of the California Environmental Quality Act (CEQA) and with sections 15040, 15081, and 15082 of the *CEQA Guidelines*, the purpose of this chapter is to identify impacts that could not be eliminated or reduced to an insignificant level by mitigation measures included as part of the project, or by other mitigation measures that could be implemented, as described in Chapter IV, pages 54 to 56.

No significant project-specific impacts have been identified. With implementation of the mitigation measures outlined in Chapter IV, Mitigation Measures, all potential significant impacts would be reduced to a less-than-significant level. The project sponsor has agreed to implement all of these mitigation measures.

The finding that potential significant impacts would be reduced to less-than-significant levels by implementation of these mitigation measures is subject to final determination by the San Francisco Planning Commission as part of its certification of the EIR. The Final EIR will be revised, if necessary, to reflect the findings of the Commission.

VI. ALTERNATIVES TO THE PROPOSED PROJECT

This chapter identifies alternatives to the proposed project and discusses environmental impacts associated with each alternative. The Planning Commission could adopt any of the following alternatives, if feasible, and if necessary to substantially lessen or avoid a significant environmental impact, instead of approving the project as proposed.

ALTERNATIVE A: NO PROJECT

Description

This alternative would entail no change to the site, which would remain in its existing condition. The existing building 235 Second Street building would not be adaptively reused, enlarged, and seismically upgraded, and the seven existing buildings immediately to the south would not be demolished. The existing buildings could be re-occupied by warehouse and distribution uses similar to the uses that currently occupy the buildings (but which are relocating out of San Francisco). This alternative, however, would not preclude future proposals for development of the project site. Given the site's location in the area in which the Downtown Plan encourages support functions to the intensive downtown core areas, it could reasonably be expected that a subsequent development proposal would include construction of additional support space such as wholesaling, printing, building services, and secondary office space.

Impacts

This alternative would result in no increase in vehicle travel or transit use, as would occur with implementation of the proposed project. There would be no project-specific effects on intersection conditions, transit use, parking, loading, or pedestrian or bicycle traffic. (These impacts would all be less than significant with the project.) Intersection operations and transit operating conditions that would degrade to unacceptable levels of service by the 2015 cumulative horizon year would do so with or without the project.

Other less-than-significant effects described in the Initial Study, including emissions of air pollutants, generation of noise during construction, wind effects, new shadows, potential discovery of subsurface cultural resources during excavation, and demolition of the existing buildings facing Clementina Street, among other impacts, would not occur with this alternative.

ALTERNATIVE B: REDUCED DEVELOPMENT

Description

This alternative would entail adaptive reuse of the existing four-story, 88,000-square-foot warehouse and distribution building located at Second and Tehama Streets, and the construction of a new three-story, 62,000-square-foot distribution and production building immediately to the south. The six existing one- and two-story industrial buildings on the southern portion of the project site would be demolished to accommodate the new building. The existing four-story building would be converted to office use and would provide about 40 parking spaces in the basement of the building that would be accessed from a driveway on Tehama Street. The two buildings would be interconnected at ground level and would together provide a total of 150,000 square feet of space (88,000 gsf of office use and 62,000 gsf of distribution and production use), or about 117,000 square feet less than with the project.

Impacts

Due to the reduced square footage devoted to office use, this alternative would result in a decrease in vehicle trip generation and transit use, as compared to the proposed project. A total of approximately 2,214 daily person trips would be generated by the combined office and distribution/production uses, representing about a 40-percent reduction over the proposed project. During the p.m. peak hour, this alternative would generate about 125 person trips. Of those 125 trips, about 38 would be made by automobiles, 68 would be transit trips, and 19 would be by walking or other modes. The alternative would generate 29 p.m. peak-hour vehicle trips, compared to the project's 57 vehicle trips. While vehicle delays at the five study intersections would be marginally reduced, the reduction would generally be less than one second and would not affect levels of service. At the intersection of Second and Howard Streets, the reduction in delay could be up to 6 seconds as compared to the project impacts, which would result in an increase in delay of 10 seconds. In general, the traffic impacts of the Reduced Development Alternative would be somewhat reduced, but would not noticeably improve traffic conditions in the project area.

This alternative would block less of the sky from view at ground level than the proposed project because the project buildings would be reduced from seven and six stories, respectively, to four and three stories. Shadow effects of this alternative would also be incrementally less than those of the proposed project, due to reduced building height. In general, the visual and shading impacts of this alternative would be comparable to those of the proposed project, which would be less than significant.

Other effects described in the Initial Study for the proposed project would also occur at the same or similar level under this alternative because many project components would be the same, including demolition of six existing buildings and development, including excavation, of the same site. All impacts would be less than significant with implementation of the mitigation included in the proposed project.

The Reduced Development Alternative would be environmentally superior to the project because it would avoid the specific environmental impacts of the project; however, as noted in Chapters IV and V, the proposed project would not generate any significant environmental effects since the project would include mitigation measures to avoid potentially significant effects. In addition, the project would not make a considerable or significant contribution to cumulative impacts.

VII. EIR AUTHORS AND PERSONS CONSULTED

EIR AUTHORS

Planning Department, City and County of San Francisco
Major Environmental Analysis
1660 Mission Street
San Francisco, CA 94103

Environmental Review Officer: Hillary E. Gitelman

EIR CONSULTANTS

During Associates

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Lynne LeRoy

Archeo-Tec (Cultural Resources)

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Clement Designs (Graphics Design)

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Rob Birmingham, President

PROJECT ARCHITECT

Fee Munson Ebert
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Christiann Maarse, Principal

PROJECT ATTORNEYS

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Susanne Beilicke

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City and County of San Francisco

Planning Department
Tim Blomgren, Planner
Bill Wycko, Planner

Municipal Railway
James Lowe

Department of Parking and Traffic
Jerry Robbins, Planner

OTHER AGENCIES AND INDIVIDUALS

Refer to the Distribution List in Appendix B.

VIII. APPENDICES

- A. Initial Study and EIR Requirement
- B. Draft EIR Distribution List
- C. Intersection Level of Service Designations

**NOTICE THAT AN
ENVIRONMENTAL IMPACT REPORT
IS DETERMINED TO BE REQUIRED**

Date of this Notice: July 10, 1999

Lead Agency: City and County of San Francisco, Planning Department
1660 Mission Street - 5th Floor, San Francisco, CA 94103

Agency Contact Person: Hillary Gitelman **Telephone:** (415) 558-6381

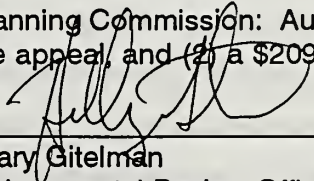
Project Title: 99.176E: 235 Second Street Williams-Sonoma Mixed-Use Development
Project Sponsor: 235 Second Street Associates
Project Contact Person: Dave Cincotta
Telephone: (415) 771-2122

Project Address: 235 Second Street, between Tehama and Clementina Streets
Assessor's Block and Lot: Block 3736, Lots, 61, 62, 64, 65, 66, and 67
City and County: San Francisco

Project Description: The proposed project would be the development of an approximately 253,000 square-foot, seven-story, office, parking, production and distribution complex by means of the demolition of six inter-connected buildings, the reuse of and 3-story addition to an existing four-story warehouse, and the construction of a new building on an approximately 42,500-sq.ft. site on the east side of Second Street between Tehama and Clementina Streets. The new building would contain about 168,800 sq.ft. of office space, about 17,470 sq.ft. of parking for 45 spaces, approximately 24,600 sq.ft. of shipping, loading and handling space, about 2,180 sq.ft. of internal open space, and about 40,000 sq.ft. of production and light manufacturing space. The project site is within the C-3-0 SD (Downtown Office-Special Development) and a 350 -S Height and Bulk District. The project would require authorization of new office space under procedures set forth in *City Planning Code* Sections 321, and approval under Section 309 of the *City Planning Code* for construction above a height of 75 feet and Permit Review in C-3 Districts.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the State CEQA Guidelines, Section 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the reasons documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Deadline for Filing of an Appeal of this Determination to the Planning Commission: August 9, 1999. An appeal requires: (1) a letter specifying the grounds for the appeal, and (2) a \$209.00 filing fee.


Hillary Gitelman
Environmental Review Officer

**235 SECOND STREET WILLIAMS-SONOMA MIXED-USE DEVELOPMENT
INITIAL STUDY
99.176E**

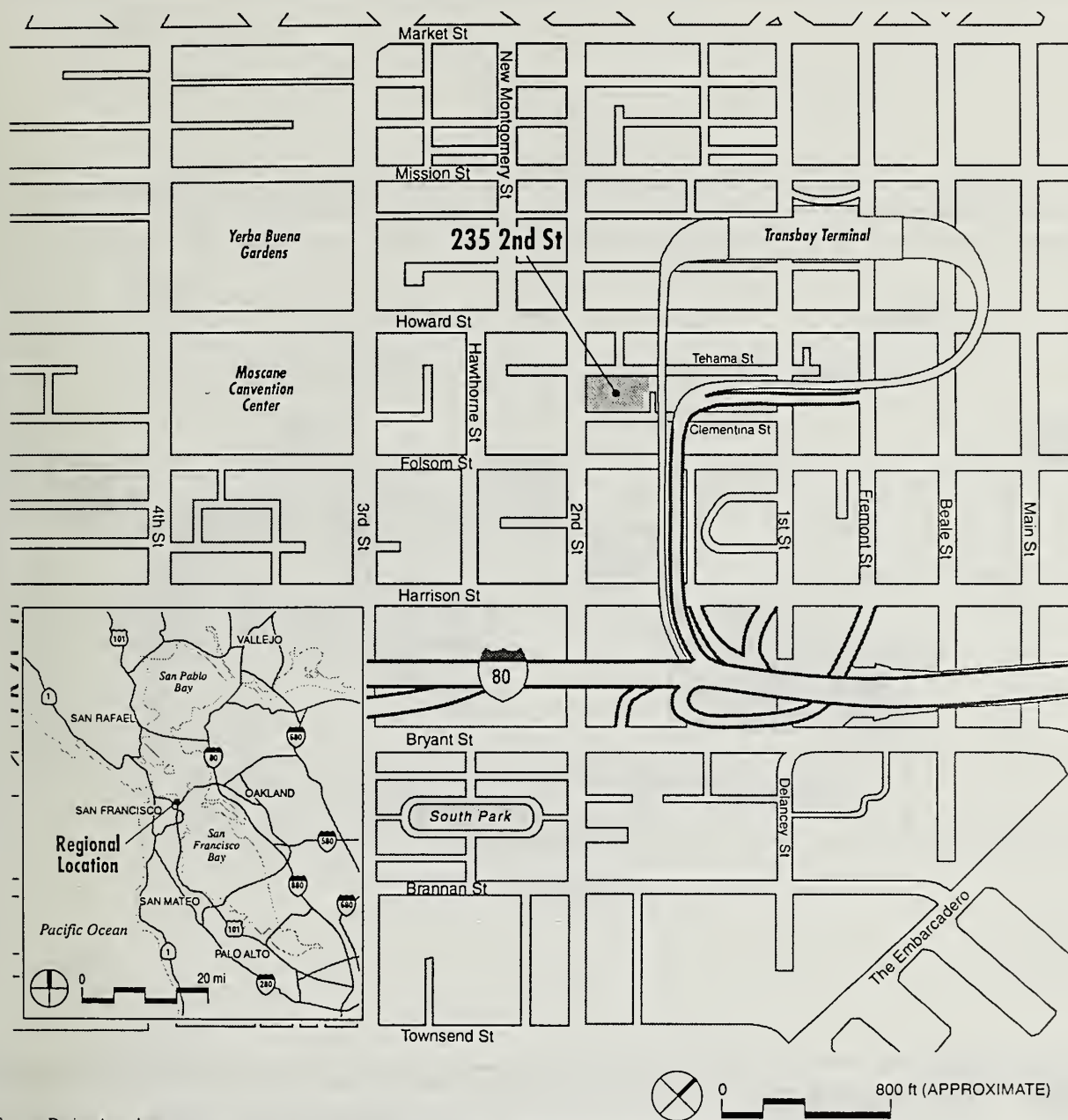
PROJECT DESCRIPTION

The proposed project would demolish six inter-connected buildings on Clementina and Second Streets, adaptively reuse and add three stories to an existing four-story warehouse on Tehama and Second Streets, and construct an approximately 253,000 gross-square-foot (gr.sq.-ft.), seven-story, 88-foot tall, office, parking, production and distribution complex at 235 Second Street (Figure 1, page 3).

The project site is in the quarter-block bounded by Second, Tehama, Clementina, and First Streets in the Transbay Terminal Area. The approximately 42,500-sq.-ft. site includes Lots 61, 62, 64, 65, 66 and 67 of Assessor's Block 3736, is zoned C-3-O (SD) (Downtown Office-Special Development) and is in a 350-S Height and Bulk District. The existing buildings on the site contain a total of 125,420 sq.ft. and currently accommodate a warehouse and distribution center for a clothing manufacturer which is relocating out of San Francisco. All the buildings on the site are connected.

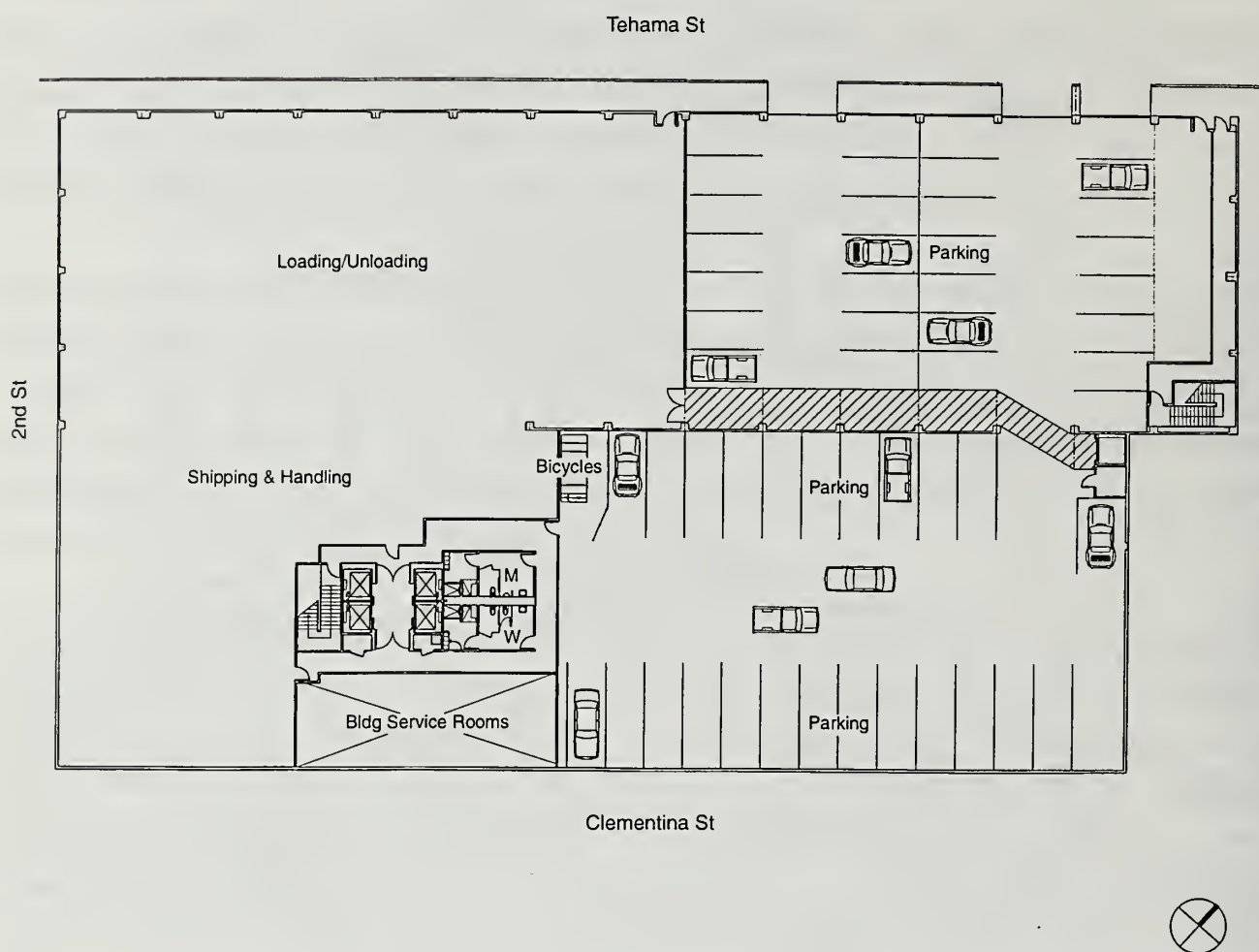
The proposed project would create a distribution center for Williams-Sonoma, Inc. that would contain offices, catalogue printing, manufacturing (display samples), production, parking, shipping and distribution. The Corporation would relocate employees from the existing operations at 3250 Van Ness Avenue, 100 North Point and 900 Geary Street. There would be about 168,800 sq.ft. of office space, about 17,470 sq.ft. of parking for 45 independently accessible spaces, approximately 24,600 sq.ft. of shipping, loading and handling space, about 2,180 sq.ft. of internal open space, and about 40,000 sq.ft. of production and light manufacturing space for a total of approximately 253,000 sq.ft. (Figures 2, 3, 4, 5, 6, 7, and 8, pages 4 to 10).

The project would retain the existing four-story, 88,000 sq.ft, reinforced concrete building at 235 Second Street (which also fronts on Tehama Street) and add three floors each containing approximately 20,000 sq.ft. The five existing buildings facing Clementina Street and one building fronting Second Street would be demolished and a six-story, approximately 88-foot tall building would be built and integrated with the existing 235 Second Street building to form a single structure. The approximately 39,900-sq.-ft. ground floor would be below grade on Clementina Street and due to the downward slope of the site to the north, the ground floor would be at grade at Tehama Street where there would be two loading entrances and the ingress and egress for the parking garage. The first floor would contain the main pedestrian entrance and



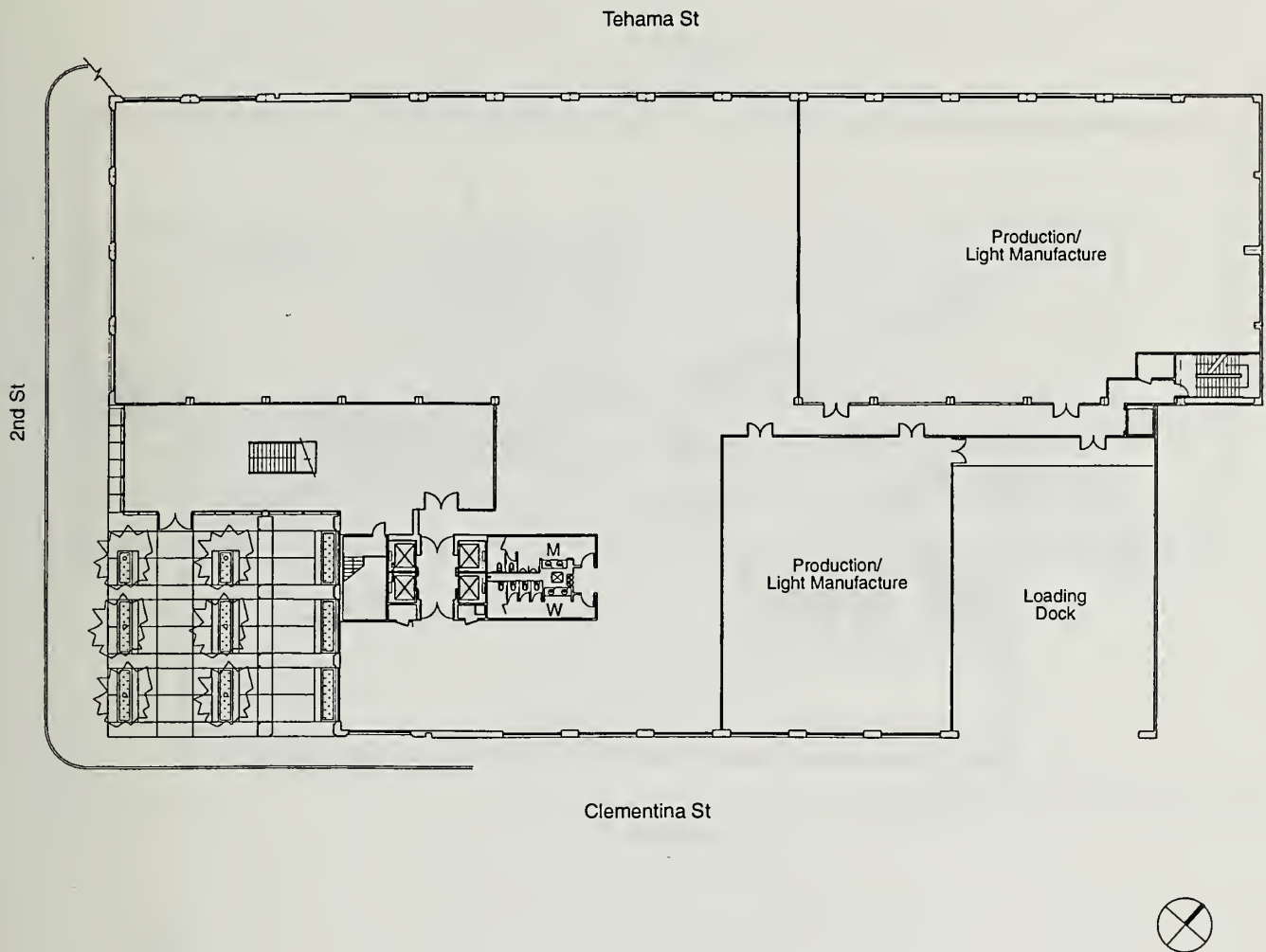
Source: During Associates

PROJECT LOCATION FIGURE 1



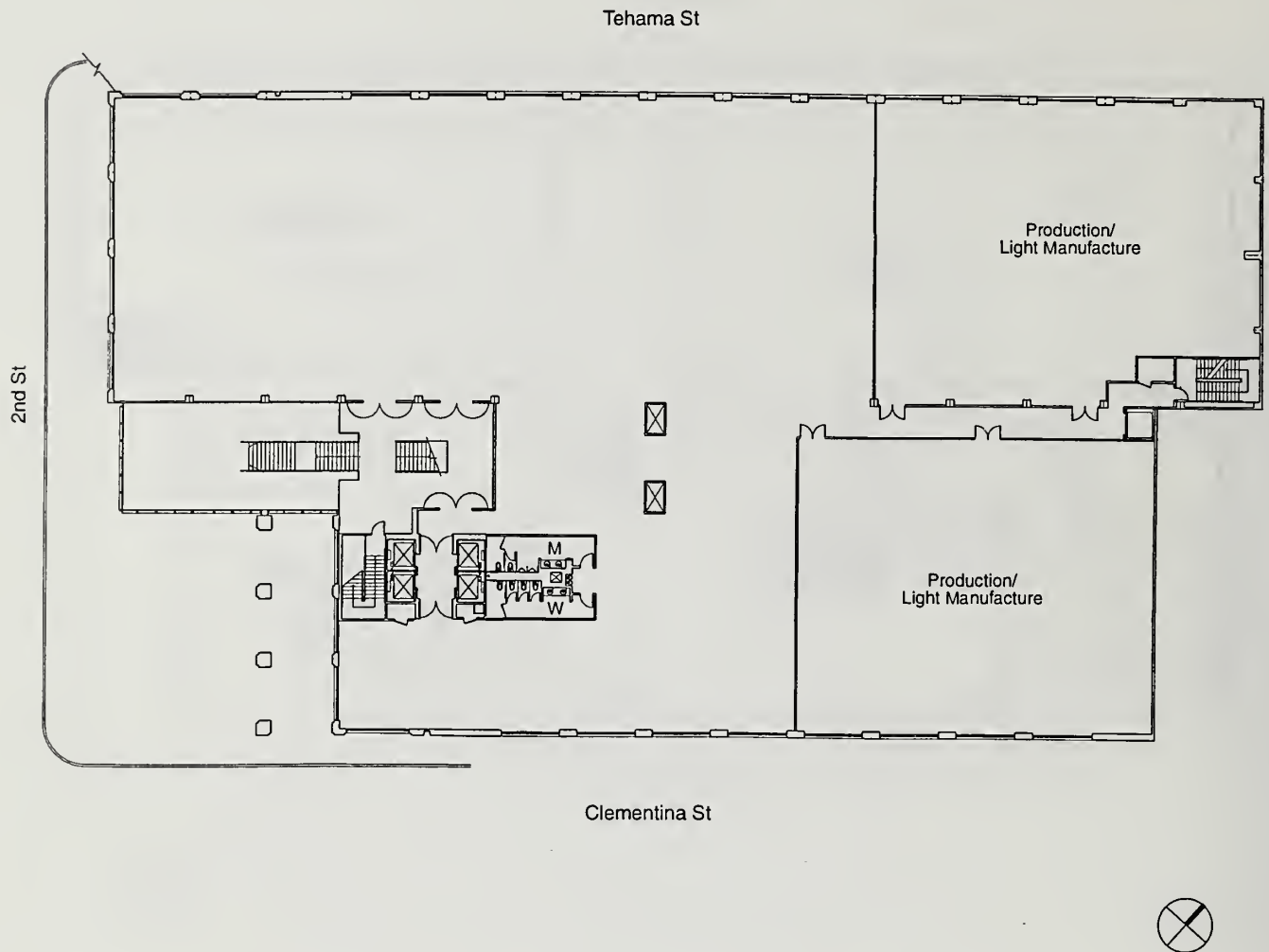
Source: Fee Munson Ebert Architects

LOWER LEVEL FLOOR PLAN FIGURE 2



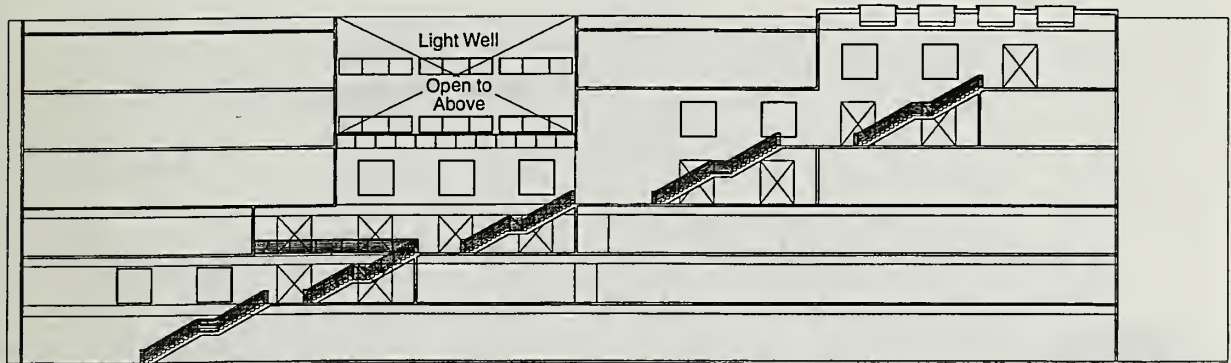
Source: Fee Munson Ebert Architects

FIRST FLOOR PLAN **FIGURE 3**



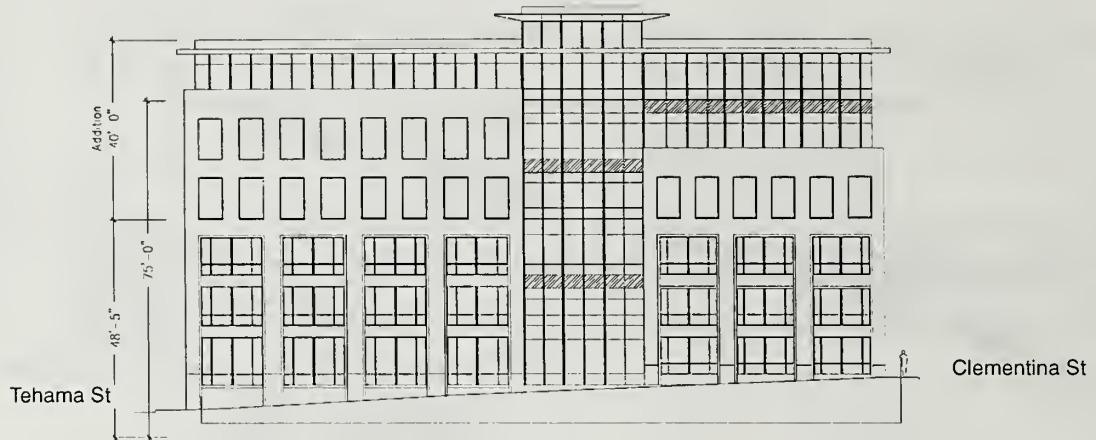
Source: Fee Munson Ebert Architects

SECOND FLOOR PLAN **FIGURE 4**



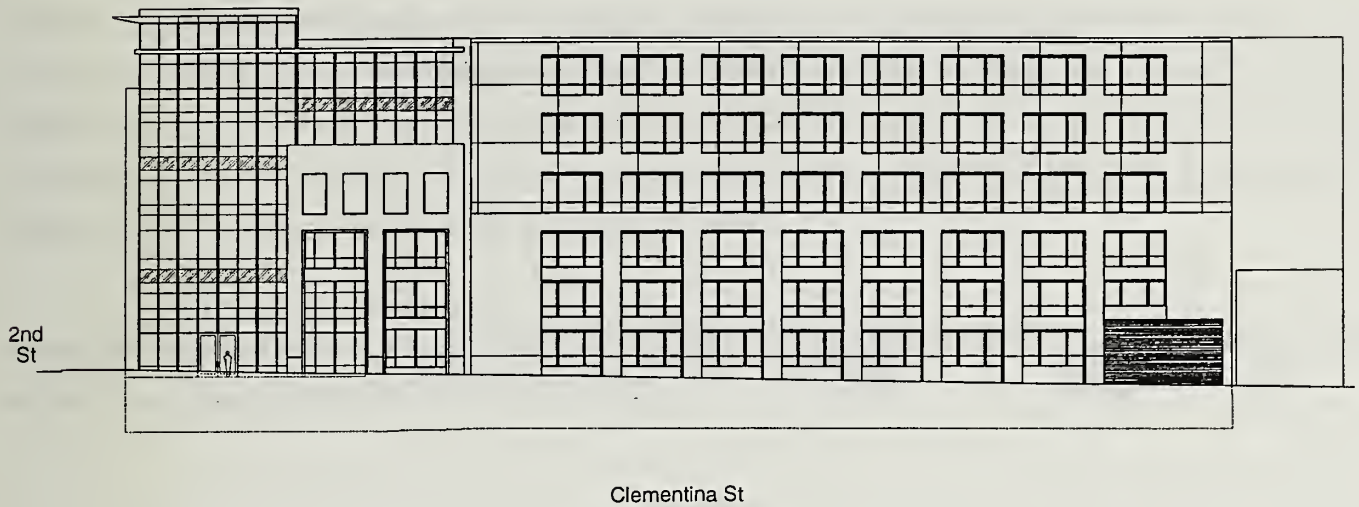
Source: Fee Munson Ebert Architects

SECTION FIGURE 5



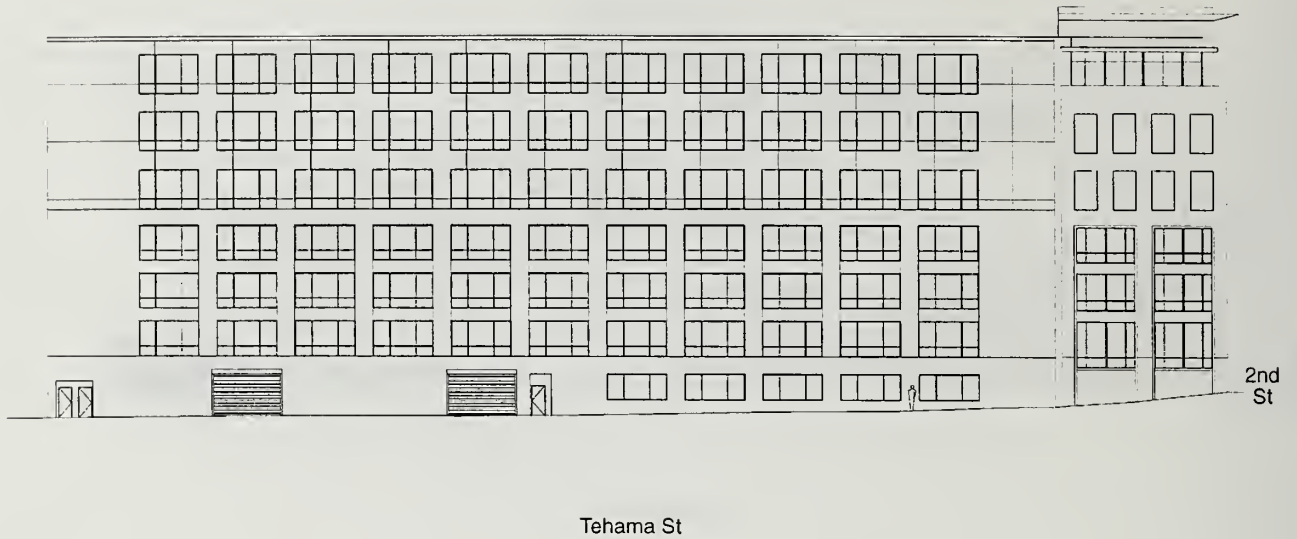
Source: Fee Munson Ebert Architects

WEST ELEVATION FROM 2ND STREET FIGURE 6



Source: Fee Munson Ebert Architects

SOUTH ELEVATION FROM CLEMENTINA STREET FIGURE 7



Source: Fee Munson Ebert Architects

NORTH ELEVATION FROM TEHAMA STREET FIGURE 8

lobby (approximately 2,130 sq.ft.), about 18,825 sq.ft. of office space, about 13,330 sq.ft. of production/light manufacturing space, and about 2,160 sq.ft. of loading space. There would be an approximately 3,230 sq.ft. plaza next to the entrance on the corner of Second and Clementina Streets. The second and third floors would contain about 19,720 sq.ft. and 23,340 sq. ft. of office space respectively, and each floor would contain about 13,330 sq.ft. of production/light manufacturing space. The fourth floor would contain about 36,240 sq.ft. of office space, the fifth would contain about 34,830 sq.ft. of office space and the sixth floor would contain about 35,830 sq.ft. of office space.

The existing buildings (totalling about 125,420 sq.ft.) contain about 2,500 sq.ft. of office space, about 61,500 sq.ft. of warehouse space, and about 61,500 sq.ft. of loading and distribution space. Thus, the proposed project would contain a net increase of approximately 166,290 sq.ft. of office space and about 40,000 sq.ft. of production and light manufacturing space, and a net decrease of about 36,900 sq.ft. of shipping and loading space and about 61,500 sq.ft. of warehouse space.

Project construction would take approximately one year. The project construction cost is estimated at \$12 million. The project architect is Fee Munson Ebert.

II. SUMMARY OF POTENTIAL ENVIRONMENTAL EFFECTS

A. EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

The 235 Second Street Project is examined in this Initial Study to identify potential effects on the environment. On the basis of this study, project-specific effects that relate to transportation have been determined to be potentially significant, and will be analyzed in an Environmental Impact Report (EIR). In addition, the EIR will provide additional discussion of land use and the project's visual quality/urban design for informational purposes, although both are determined in this Initial Study to be less-than-significant impacts.

B. EFFECTS FOUND NOT TO BE SIGNIFICANT

The following potential effects were determined either to be less than significant or to be mitigated through measures included in the project. These items are discussed in Section III below, and require no further environmental analysis in the EIR: land use; visual quality, including light and glare; population, including housing and employment; noise; air quality, including shadow and wind; utilities/public services; biology; geology/topography; water; energy; hazards; and cultural resources.

III. ENVIRONMENTAL EVALUATION CHECKLIST AND DISCUSSION

With several exceptions, all items on the Initial Study Environmental Evaluation Checklist incorporated below have been checked "No," indicating that, upon evaluation, staff has determined that the proposed project could not have a significant adverse impact on the environment in the topic areas indicated. For items where the conclusion is "To be Determined," further analysis will be conducted in the EIR. Many Checklist items have been checked "Discussed," indicating that the Initial Study text includes discussion about that particular issue. For all of the items checked "No" without a discussion, the conclusions regarding potential significant adverse environmental effects are based on field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Planning Department such as the Department's Transportation Guidelines for Environmental Review, or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Game. For each Checklist item, staff considered both the individual and cumulative impacts of the proposed project.

A. COMPATIBILITY WITH ZONING, PLANS AND POLICIES

| | <u>N/A</u> | <u>Discussed</u> |
|--|--------------------------|-------------------------------------|
| 1. Discuss any variances, special authorizations, changes proposed to the City Planning Code or Zoning Map, if applicable. | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 2. Discuss any conflicts with any other adopted environmental plans and goals of the City or Region, if applicable. | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

The project is located within the boundaries of the Downtown Plan, an Area Plan of the *San Francisco General Plan*. The Downtown Plan is the policy document that guides growth and development in San Francisco's downtown area. Centered on Market Street, the Plan covers an area roughly bounded by Van Ness Avenue to the west, The Embarcadero to the east, Folsom Street to the south, and the northern edge of the Financial District to the north. The Plan contains objectives and policies which address the following issues: provision of space for commerce, housing, and open space; preservation of the past; urban form; and movement to, from, and within the downtown area (transportation). The Downtown Plan was intended to manage growth in this area, including maintaining a compact downtown core and directing growth to areas with developable space and easy transit accessibility so downtown would "encompass a compact mix of activities, historical values, and distinctive architecture and urban forms that engender a special excitement reflective of a world city (Downtown Plan, p. II.1.1). The Downtown Plan limits growth in the traditional downtown, centered in the Financial District, by adjusted height limits and FARs (floor area ratios). The Plan does, however, identify specific South of Market area, which include the proposed project site, for

high-rise office development. While no substantial or obvious conflicts with the Plan have been identified, relevant policies of the General Plan will be discussed further in the EIR.

The San Francisco *Planning Code*, which incorporates by reference the City's Zoning Maps, implements the *General Plan*, and governs permitted uses, densities, and the configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless either the proposed project conforms to the *Code*, or an exception is granted pursuant to provisions of the *Code*.

The project is within a C-3-0 SD (Downtown Office-Special Development) District. The *Planning Code* states that the C-3-0 SD District "accommodates near the intensive downtown core areas important supporting functions such as wholesaling, printing, building services, secondary office space and parking. The district has for the most part been under-developed in the past, and opportunities exist for major developments of new uses covering substantial areas" (Section 210.3). As a office, printing, manufacturing, shipping, distribution and parking building, the proposed project is a principal permitted use in the C-3-0 SD District.

The project site is also within the 350-S Height and Bulk District which permits buildings up to 350 feet in height, with setbacks above the base (generally above a streetwall height up to 1.25 times the width of the widest abutting street or 50 feet, whichever is more). At 88 feet maximum height and a maximum width of 270 feet, the proposed project would be within the 350 height limit and would not require any exception from the bulk limits.

Section 309 of the *City Planning Code*, Permit Review in C-3 Districts, governs the review of project authorization and building and site permit applications in C-3 Districts. Section 309 also permits the imposition of certain conditions in regard to such matters as a project's siting and design, view, parking, traffic and transit effects; energy consumption; pedestrian environmental; and other matters. As an office project, the project would also be subject to *City Planning Code* Section 321 - Office Development: Annual Limit, and certain other *Planning Code* sections: transportation management and transportation brokerage services (Section 163); the Office of Affordable Housing Production Program (Section 313 et. seq) child care provisions fees (Section 314 et. seq.); and downtown park fees (Section 139). Approvals necessary for the project and the relationship of the project to *Planning Code* requirements will be described further in the EIR.

Environmental plans and policies are those, like the Bay Area Air Quality Management District's 1997 *Clean Air Plan*, which directly address physical environmental issues and/or contain targets or standards which

must be met in order to preserve or improve characteristics of the City's physical environment. The current proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the *San Francisco Planning Code* to establish eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; maximization of earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under the California Environmental Quality Act (CEQA) or adopting any zoning ordinance or development agreement, the Planning Commission is required to find that the proposed project or legislation is consistent with the Priority Policies. The motion by the Planning Commission approving or disapproving the project will contain the analysis determining whether the project is in conformance with the Priority Policies.

B. ENVIRONMENTAL EFFECTS

| | <u>Yes</u> | <u>No</u> | <u>Discussed</u> |
|---|--------------------------|-------------------------------------|-------------------------------------|
| 1. <u>Land Use</u> - Could the project: | | | |
| a. Disrupt or divide the physical arrangement of an established community? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Have any substantial impact upon the existing character of the vicinity? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

As noted in the project description, the approximately 42,000-square-foot rectangular project site is located at the western end of the half-block bounded by Clementina, Second, Tehama, and First Streets in San Francisco's South of Market neighborhood and in the Transbay Redevelopment Study Area. This area transitions from high-intensity office use in the Financial District to mixed low-rise commercial uses in the South of Market Area.

The site is about one block south of the Transbay Terminal, three blocks south of the Financial District, six blocks west of The Embarcadero, and about one block east of Moscone Convention Center. The Yerba

Buena Center Redevelopment Project Area is directly west of the project site across Second Street, and the New Montgomery-Second Streets Conservation District is one-half block to the north.

The northern half of the site is currently occupied by a four-story cement building, and the southern half of the site contain six inter-connected one-to two-story industrial buildings which total about 125,420 sq.ft.. The buildings are all connected and contain a loading and distribution center for a clothing manufacture (Fritzi California), which is being consolidated and relocated out of San Francisco.

Although the immediate site vicinity is dominated by small office buildings, the area to the south and west of the project block is more characterized by a mixture of uses in a wide variety of building types and sizes. A number of new projects are planned or under construction near the project site. A 17-story, 162-foot-high, 414 room hotel is planned directly south of the project on Second and Clementina Streets; an 8-story, 109-foot-high, approximately 242 gross square-foot office building has been approved for construction on the south side of Folsom Street (631 Folsom) between Second and Hawthorne Streets; and a 13-story, about 182 foot-high, 91-unit residential building complex is under construction at 246 Second Street directly west of the project. A residential project has been proved on Hawthorne and Zoe Street, and a 27-story office building is under construction at 101 Second Street at Mission Street about two blocks north of the project site.

East of the project site an elevated bus ramp extends in a north-south direction, leading from the Bay Bridge to the Transbay Terminal, located at First and Mission Streets. The area under the ramp is used for public parking from south of Harrison Street to north of Howard Street. West of the project site on Second Street is the marble Marine Fireman's Union building.

The proposed project would change land uses on the site from loading and distribution to a mixture of office, distribution, manufacturing, and parking, and would thus increase the intensity of uses on the project site. The office, production, and distribution uses proposed for the site are permitted uses in the C-3-0 SD Zoning District and would be consistent with the existing and planned uses in the vicinity. The project would not have a substantial adverse effect on land use. Because the project would be developed within the existing block and street configuration, it could not divide the physical arrangement of an established community. For informational purposes land use will be addressed in the EIR.

Yes No Discussed

2. **Visual Quality** - Could the project:

- | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|
| a. Have a substantial, demonstrable negative aesthetic effect? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially degrade or obstruct any scenic view or vista now observed from public areas? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Generate obtrusive light or glare substantially impacting other properties? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

The proposed project would result in a visual change at the site, since it would demolish six existing one-to two-story buildings on Second and Clementina Streets and construct one substantially larger six-story (plus ground floor) building that would add three stories to the adjacent four-story warehouse on Second and Tehama Streets. The height and bulk of the proposed buildings would be similar to or less than that of other buildings in the immediate vicinity. The proposed 17-story, approximately 162-foot high hotel to the south and up hill of the project between Clementina and Second Streets would be nearly twice as high as the proposed project. The approximately 182-foot high residential condominium directly west of the project across Second Street would be nearly 100 feet higher than the project.

The project would feature a seven-story glass curtain wall at the entrance, and would be designed to be compatible with the surrounding buildings in the area. An approximately 3,230 square-foot plaza would be on the corner of Second and Clementina next to the main entrance of the building.

Given the fact that the project would be within a group of nearby buildings that would be higher and generally comparable in bulk, it cannot be concluded that the project would result in a substantial or demonstrable negative aesthetic effect, or that it would substantially degrade the existing visual character of the site and its surroundings. Decision makers who will consider whether to approve or disapprove the proposed project, will review the proposed design further, and may nonetheless request changes in height, massing, materials, or other design elements.

Views of the project site from Second, Tehama, and Clementina Streets and surrounding areas would be altered by construction of the project. However, the project would not obstruct any scenic views currently enjoyed from public open spaces, and would not substantially affect views from other locations. For informational purposes and to assist in the understanding of the project, the EIR will discuss visual quality and urban design and will provide several photomontages of the proposed buildings in the context of surrounding structures.

The project would comply with Planning Commission Resolution No. 9212 which prohibits the use of mirrored or reflective glass. The project sponsor would also not include exterior lighting in excess of amounts common and accepted in urban areas. The project would not, therefore, generate obtrusive light or glare substantially impacting other properties; hence, light and glare will not be discussed in the EIR.

| | <u>Yes</u> | <u>No</u> | <u>Discussed</u> |
|---|--------------------------|-------------------------------------|-------------------------------------|
| 3. <u>Population</u> - Could the project: | | | |
| a. Induce substantial growth or concentration of population? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Displace a large number of people (involving either housing or employment)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Create a substantial demand for additional housing in San Francisco, or substantially reduce the housing supply? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

The project would retain and expand on existing four-story, 88,000 sq.ft, reinforced concrete building at Second and Tehama Streets, demolish and replace the six buildings totalling about 125,420 sq.ft. The resulting new building would contain approximately 253,000 gross sq.ft. of office, production, distribution and parking space for a net gain of approximately 166,290 sq.ft. of office space and about 40,000 sq.ft. of production and light manufacturing space, and a loss of about 36,900 sq.ft. of shipping and loading space and about 61,500 sq.ft. of warehouse space. The current tenant, the clothing manufacturing firm "Fritzi of California," employs approximately 100 people on the project site, and many more in the area. Fritzi was acquired by a larger company within the last several years, and its operations are being relocated out of the City. This relocation would occur whether or not the proposed project is approved, and current employees would either be relocated or would need to seek other employment.¹

The proposed project tenant, Williams-Sonoma, Inc. would relocate approximately 680 employees to the site from existing space at 3250 Van Ness Avenue, 100 North Point and 900 Geary Street in San Francisco, and would hire about 220 new employees for a total on-site employment of about 900 people.² The project would not be expected to directly attract new employees to San Francisco or the region, however, existing space vacated by the project sponsor could accommodate new employment within the City. Increased employment on the project site may be noticeable to those most familiar with the area, particularly in the context of cumulative growth, which will bring new residents, employees, and visitors to the Second Street corridor in the near future. This growth will not exceed forecasted amounts and would not be considered significant in the urban context of San Francisco.

San Francisco consistently ranks as one of the most expensive housing markets in the United States. San Francisco is the central city in an attractive region known for its agreeable climate, open space, and

recreational opportunities, cultural amenities, strong and diverse economy, and prominent educational institutions. As a regional employment center, San Francisco attracts people who want to live close to where they work. These factors continue to support strong housing demand in the City. New housing to relieve the market pressure created by the strong demand is particularly difficult to provide in San Francisco because the amount and availability is limited, and because land and development costs are high.

The proposed project would not create a substantial demand for new housing. Using the City's proposed updated Jobs-Housing Linkage Program methodology, the project's office space would create a housing demand equivalent to about 275 new households.³ These households would represent less than one-tenth percent of total new households forecast between 1995 and 2015 (32,320 households).⁴ As noted, the project-related housing demand would be less than these levels since most of the employees would be relocated from other sites in San Francisco.

Housing demand from a single development project, in and of itself, is not a physical environmental effect under CEQA. Nonetheless, under current requirements of Section 313 of the *San Francisco Planning Code*, the project sponsor would be required to contribute to affordable housing production in San Francisco, either by directly constructing housing or by paying an in-lieu fee. Complying with OAHPP is the manner in which San Francisco typically addressed housing demand effects from individual office development projects.

Based on the above analysis no significant physical environmental effects on housing demand or population would occur, and these issues require no further analysis in the EIR. Other physical effects of this increase in population on site will be addressed in the EIR by topic, primarily in the area of transportation.

NOTES - Population

- ¹ Rob Birmingham, project sponsor, 235 Second Street Associates, personal communication, May 5, 1999 to During Associates.
- ² Susi Browne, Facilities Director, Williams-Sonoma Inc., letter, June 3, 1999 to During Associates. This letter is on file at the San Francisco Planning Department, 1660 Mission Street, in Project File NO. 99.176E.
- ³ Total project employment at buildout minus existing employment capacity on the site. The methodology of the Office Affordable Housing Production Program Ordinance (City and County of San Francisco *Planning Code*, Section 313) applies only to office development. To more accurately estimate housing demand for today's socioeconomic conditions, the proposed updated assumptions include 55% of new employees will live in the City in households with an average of 1.6 workers per household (City and County of San Francisco Planning Department and the San Francisco Redevelopment Agency *Mission Bay Subsequent EIR*, SCH No. 97092068, September 1998, Volume IV, Appendix C, p.C.8, Table C.8, Jobs/Housing Analysis for the Proposed Project).
- ⁴ Ibid.

Yes No Discussed

4. **Transportation/Circulation** - Could the project:

- | | |
|--|-------------------------|
| a. Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system? | <u>To be Determined</u> |
| b. Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic hazards? | <u>To be Determined</u> |
| c. Cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity? | <u>To be Determined</u> |
| d. Cause a substantial increase in parking demand which cannot be accommodated by existing parking facilities? | <u>To be Determined</u> |

Increased employment on the project site would result in increased demands on the local transportation system, including increased traffic, transit demand and parking demand. Approximately 45 parking spaces would be provided in the proposed project. The EIR will discuss project effects related to traffic and circulation, including intersection operations, transit demand, and impacts on pedestrian circulation, parking, bicycles, and freight loading as well as potential traffic impacts during construction.

Yes No Discussed

5. **Noise** - Could the project:

- | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|
| a. Increase substantially the ambient noise levels for adjoining areas? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Violate Title 24 Noise Insulation Standards, if applicable? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Be substantially impacted by existing noise levels? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

The proposed construction could generate noise and possibly vibration that may be considered an annoyance by occupants of nearby properties. However, due to the temporary and intermittent nature of construction noise, and the relatively high traffic noise levels already existing in the immediate area, it would not be considered significant. Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code). The Noise Ordinance requires that construction work be conducted in the following manner: 1) noise levels of construction equipment, other than impact tools, must not exceed 80 decibels (DBA; a unit of measure for sound - "A" denotes the A-weighted scale, which simulates the response of the human ear to various frequencies of sound) at a distance of 100 feet from the source (the equipment generating the noise); 2) impact tools must have intake and exhaust mufflers that are approved by the Director of the Department of Public Works to best accomplish maximum noise reduction; and 3) if the noise from the construction work would exceed the ambient noise levels at the site

property line by 5 DBA, the work must not be conducted between 8:00 PM and 7:00 AM, unless the Director of the Department of Public Works authorizes a special permit for conducting the work during that period. Because project construction noise would be temporary and intermittent and thus would not be considered significant, construction noise requires no further analysis and will not be addressed in the EIR.

The noise generated by occupancy of the proposed office building would be limited to vehicles arriving at and departing from the internal parking structure and loading zones, and would not be considered a significant impact of the proposed project. Such noise would be virtually unnoticed within the urban context of the project area. Based on published scientific acoustic studies, to produce an increase in ambient noise levels noticeable to most people in the project area, the traffic volumes in the area would need to double, which would not occur with implementation of the proposed project. Hence, operational noise requires no further analysis and will not be discussed in the EIR.

| | <u>Yes</u> | <u>No</u> | <u>Discussed</u> |
|---|--------------------------|-------------------------------------|-------------------------------------|
| 6. <u>Air Quality/Climate</u> - Could the project: | | | |
| a. Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Permeate its vicinity with objectionable odors? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Alter wind, moisture or temperature (including sun shading effects) so as to substantially affect public areas, or change the climate either in the community or region? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

Effects on Ambient Air Quality

The Bay Area Air Quality Management District (BAAQMD) operates a regional monitoring network which measures the ambient concentrations of six air pollutants (the "criteria pollutants"): ozone(O₃), carbon monoxide (CO), fine particulate matter (PM₁₀), lead (Pb), nitrogen dioxide (NO₂) and sulfur dioxide (SO₂).

The federal Clean Air Act and the California Clean Air Act of 1988 require that the State Air Resources Board, based on air quality monitoring data, designate portions of the state where the federal or state ambient air quality standards are not met as "non-attainment areas." Because of the differences between the national and state standards, the designation of nonattainment areas is different under the federal and state legislation. On the basis of the monitoring data, the Bay Area, had been designated a "non-attainment" area with respect to the Federal O₃ and CO standards. In 1995, the Bay Area was redesignated by the U.S.

Environmental Protection Agency as a "maintenance area" for ozone, and in 1997, the Bay Area was redesignated to "maintenance area" for CO. However, in June of 1998, the U.S. Environmental Protection Agency, based on data from 1995-1997, reclassified the Bay Area again as non-attainment area for ozone, essentially reversing the 1995 action. The air basin is an attainment area or is unclassified for all other national ambient air quality standards. In addition, San Francisco has experienced violations of the state PM_{10} standards.

A four-year (1994 to 1997) summary of data collected at the BAAQMD monitoring station at 10 Arkansas Street (about four blocks east of the project site) indicated that there were no violations of either the one-hour or eight-hour CO standards, or the standards for ozone, nitrogen dioxide, sulfur dioxide or lead. The state PM_{10} standard was exceeded on 0 to 6 days each year during the four year period of 1994-1997.

Comparison of these data with those from other BAAQMD monitoring sites indicates that San Francisco's air quality is among the least degraded of all urbanized portions of the Bay Area. Three of the prevailing winds, west, northwest, and west-northwest, which blow off the Pacific Ocean, reduce the potential for San Francisco to receive air pollutants from elsewhere in the region, and these winds also disperse air pollutants arising in San Francisco to other parts of the Bay Area.

Data from air quality monitoring in San Francisco show that there have been violations of the state (but not federal) fine particulate standards. Prior to 1989, occasional violations of the state and federal 8-hour standard for carbon monoxide were also recorded annually. CO is a non-reactive air pollutant, the major source of which is motor vehicles. CO concentrations are generally highest during periods of peak traffic congestion. Particulate levels are relatively low near the coast and increase with distance from the coast, peaking in dry, sheltered valleys. The primary sources of particulates in San Francisco are construction and demolition, combustion of fuels for heating, and vehicle travel over paved roads.¹

San Francisco, like all other sub-regions in the Bay Area, contributes to regional air quality problems, primarily O_3 , in other parts of the Bay Area. Ozone is not emitted directly from air pollutant sources, but is produced in the atmosphere over time and distance through a complex series of photochemical reactions involving hydrocarbons (HC) and nitrogen oxides (NO_x), which are carried downwind as the photochemical reactions occur. Ozone standards are violated most often in the Santa Clara, Livermore and Diablo Valleys, because local topography and meteorological conditions favor the build-up of ozone precursors there.

In 1995, emissions from motor vehicles were the source of 70 percent of the CO, 41 percent of the Hcs, 72 percent of the PM_{10} , 89 percent of the sulfur oxides and 53 percent of the NO_x emitted in San Francisco.²

Under the California Clean Air Act, the entire San Francisco Bay Air Basin is a nonattainment area for ozone and PM_{10} . The air basin is either attainment or unclassified for other pollutants.

The Bay Area has both a federal and state air quality plan. Both plans propose the imposition of controls on stationary sources (factories, power plants, industrial sources, etc.) and Transportation Control Measures designed to reduce emissions from automobiles.

Air quality impacts from a project, such as the subject office building project, result from project construction and operation. Construction emissions, primarily dust generated by earthmoving activities and criteria air pollutants emitted by construction vehicles, would have a short-term effect on air quality. Operational emissions, generated by project-related traffic and by combustion of natural gas for building space and water heating, would continue to affect air quality throughout the lifetime of the project.

Construction Emissions

Construction activities such as demolition, excavation and grading operations, construction vehicle traffic and wind blowing over exposed earth would generate exhaust emissions and fugitive particulate matter emissions that would temporarily affect local air quality. Construction activities would not involve burning of any materials and would not create objectionable odors. Grading and other construction activities would temporarily affect local air quality for a period of months, causing a temporary increase in particulate dust and other pollutants. Dust emission during excavation would increase particulate concentrations near the site. Under high winds, exceeding 12 miles per hour, localized effects including human discomfort might occur downwind from blowing dust. Construction dust is composed largely of large particles that settle out of the atmosphere more rapidly with increasing distance from the source. More of a nuisance than a hazard for most people, this dust could affect persons with respiratory diseases, as well as sensitive electronic or communications equipment. Consistent with BAAQMD CEQA Guidelines, construction-period air emissions are considered less than significant if effective control measures are implemented. The project sponsor has agreed to implement Mitigation Measure #1, page 37.

Operations Emissions

Project operation would affect local air quality by increasing the number of vehicles on project-impacted roads and at the project site, and by introducing stationary emissions to the project site. Transportation sources would account for over 90 percent of operational project-related emissions. Stationary source emissions, generated by combustion of natural gas for building space and water heating, would be less-than-significant.

Local Impacts

On the local scale, the project would change traffic on the local street network, changing carbon monoxide levels along roadways used by project traffic. Carbon monoxide is an odorless, colorless poisonous gas whose primary source in the Bay Area is automobiles. Concentrations of this gas are highest near

intersections of major roads.

The Bay Area Air Quality Management District has identified three criteria that would require the estimation of local carbon monoxide concentrations:

- Project vehicle emissions would exceed 550 pounds per day
- Project traffic would impact intersections or roadway links operating at Level of Service (LOS) D, E or F or would cause LOS to decline to D, E or F
- Project traffic would increase traffic volumes on nearby roadways by 10 percent or more.

The URBEMIS-7G computer program was applied to project daily trip generation under winter conditions to estimate total project-related carbon monoxide emissions. The resulting emission of 642 pounds/day of carbon monoxide from project-generated vehicles exceeds the BAAQMD threshold of significance of 550 pounds/day. Project traffic would, as well, contribute to the traffic delays at two intersections currently operating at LOS D, E or F and cause the LOS to go from C to D at one intersection. Therefore, carbon monoxide concentrations at these three intersections were estimated using a CALINE-4 screening procedure.

Table 1 below shows predicted 1-hour and 8-hour averaged carbon monoxide concentrations at the three intersections that meet the BAAQMD criteria for modeling. Project traffic would increase concentrations by

Table 1
EXISTING AND PROJECTED CURBSIDE CARBON MONOXIDE
CONCENTRATIONS AT SELECTED INTERSECTIONS*

| Intersection | Without Project (2000) | | With Project (2000) | |
|--------------------------|------------------------|--------|---------------------|--------|
| | 1-Hour | 8-Hour | 1-Hour | 8-Hour |
| Second St./Folsom Street | 11.1 | 7.5 | 11.1 | 7.5 |
| First St./Folsom Street | 10.4 | 7.0 | 10.4 | 7.0 |
| First St./Howard St. | 10.5 | 7.1 | 10.5 | 7.1 |
| Most Stringent Standard | 20.0 | 9.0 | 20.0 | 9.0 |

* Calculations were made using a screening procedure contained in the *BAAQMD CEQA Guidelines*. Background concentrations of 6.6 PPM (1-hour) and 4.4 PPM (8-hour) were calculated using 1992 isopleths of carbon monoxide concentration and rollback factors developed by the Bay Area Air Quality Management District. The one-hour State standard is 20 PPM, the one-hour federal standard is 35 PPM, and the eight-hour State and federal standards are 9 PPM. Emission factors were derived from the California Air Resources Board EMFAC7F computer model (Version 1.1).

Source: Don Ballanti, Certified Consulting Meteorologist

no more than 0.1 Parts Per Million (PPM) for either intersection. Concentrations are below the applicable state/federal standards, so project impacts on local carbon monoxide concentrations would be less-than-significant.

Regional Impacts

Project traffic would also have an effect on air quality outside the project vicinity. Trips to and from the project would result in air pollutant emissions over the entire Bay Area. To evaluate emissions associated with the project, the URBEMIS-7G computer program was employed. The daily increases in regional emissions from auto travel are shown in Table 2 below for reactive hydrocarbons and oxides of nitrogen (two precursors of ozone), and PM₁₀ (particulate matter, 10 micron).

Guidelines for the evaluation of project impacts issued by the Bay Area Air Quality Management District consider emission increases to be significant if the project emissions exceed 80 lbs per day for regional pollutants (HC, NO_x, PM₁₀). Project emissions shown in Table 2 are below these criteria for these pollutants, so the proposed project would have a less-than-significant impact on regional air quality.

Table 2
PROJECT REGIONAL EMISSIONS IN POUNDS PER DAY*

| | Reactive Hydrocarbons | Nitrogen Oxides | PM ₁₀ |
|------------------------|--------------------------|--------------------|------------------|
| Project Daily Emission | 18.4 | 24.0 | 7.9 |
| BAAQMD Threshold | 80.0 | 80.0 | 80.0 |

- * Estimates of regional emissions generated by project traffic were made using a program called URBEMIS-7G. Inputs to the URBEMIS-7G program include trip generation rates, vehicle mix, average trip length by trip type and average speed. Trip generation rates for project land uses were provided by the project transportation consultant. Average trip lengths and vehicle mixes for the Bay Area were used. Average speed for all types of trips was assumed to be 25 MPH. The analysis assumed a year 2000 vehicle mix. The URBEMIS-7G runs assumed summertime conditions for ROG, NO_x and PM₁₀.

Source: Don Ballanti, Certified Consulting Meteorologist

Shadow

The proposed 235 Second Street building would add three floors to an existing 48½-foot tall building and would replace six one- to two-story buildings with an 88-foot tall building (plus a seven-foot penthouse), which would increase the amount of shadow on area streets and sidewalks at certain times of the day and

year. Section 295 of the *Planning Code* was adopted in response to Proposition K (passed in November 1984) in order to protect certain public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year around. Section 295 restricts new shadow upon public spaces under the jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet unless the Planning Commission finds the impact to be insignificant. To determine whether this project would conform with Section 295, a shadow fan analysis was prepared by the Planning Department, which concluded that project-generated shadow would not reach any Proposition K protected properties (a copy of this report is available for review in Project File No. 98.714E at the Planning Department, 1660 Mission Street, San Francisco). The project, however, would at times shade portions of Second and Tehama Streets, as well as the sidewalks adjacent to the project building along these streets. The new shadows created by the project would not exceed levels commonly expected in urban areas, and would not be considered significant. Hence, the EIR will not discuss shadow.

Wind

Wind conditions partly determine pedestrian comfort on sidewalks and in other public areas. In downtown areas, tall buildings can redirect wind flows around and down to street level, resulting in increased wind speed and turbulence at street level. According to Don Ballanti, Certified Consulting Meteorologist, the proposed project building would not cause wind levels to exceed the *Planning Code*-established comfort criteria because of the building's exposure, massing and orientation of the proposed design.³ The site is sheltered from prevailing winds by existing structures, and wind measurements near the site along Clementina Street found that existing winds fall below San Francisco's comfort and hazard criteria for pedestrian space. While the Second Street facade of the building is somewhat exposed and continuous (indicating that wind accelerations are likely), the project's mid-block location and relatively low height would suggest that any such accelerations would be moderate. Therefore, this topic will not be discussed in the EIR.

Notes - Air Quality

¹ Bay Area Air Quality Management District, *BAAQMD CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans*, April 1996.

² Ibid.

³ Don Ballanti, Certified Consulting Meteorologist, letter to During Associates June 22, 1999. This letter is available for review in Project File No. 99.176E at the Planning Department, 1660 Mission Street, San Francisco.

Yes No Discussed

7. **Utilities/Public Services** - Could the project:

- | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|
| a. Breach published national, state or local standards relating to solid waste or litter control? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Extend a sewer trunk line with capacity to serve new development? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Substantially increase demand for schools, recreation or other public facilities? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Require major expansion of power, water, or communications facilities? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

The proposed project would incrementally increase demand for and use of public services and utilities on the site and increase water and energy consumption, but not in excess of amounts expected and provided for in the project area, and would not be expected to have any measurable impact on public services or utilities. The new building would be designed to incorporate water-conserving measures, such as installing low-flush toilets and urinals, as required by California State Building Code Section 402.0(c). The project would be undertaken in a fully built-out area of downtown San Francisco, where all utilities and services are currently provided for; no need for any expansion of public utilities or public service facilities is anticipated. Therefore, effects would not be significant, and this topic requires no further analysis and will not be discussed in the EIR.

Yes No Discussed

8. **Biology** - Could the project:

- | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|
| a. Substantially affect a rare or endangered species of animal or plant, or the habitat of the species? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Require removal of substantial numbers of mature, scenic trees? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

The project site is covered with impervious surfaces and is located within an urban area which has been developed since the late nineteenth century. Development of the site would not affect, or substantially diminish, plant or animal habitats. The project would not interfere with any resident or migratory species. The open space proposed as part of the project would include plants and street trees appropriate for the urban landscape of the project site. Therefore, no further analysis is required and this topic will not be included in the EIR.

Yes No Discussed

9. **Geology/Topography** - Could the project:

- | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|
| a. Expose people or structures to major geologic hazards (slides, subsidence, erosion and liquefaction)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Change substantially the topography or any unique geologic or physical features of the site? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

The elevation of the project site ranges from approximately 30 feet above Mean Sea Level (MSL) along Tehama Street on the north to about 40 feet MSL at the southwest corner at Second and Clementina Streets. The site is on the northwest side of Rincon Hill and slopes towards the northwest. Second Street, adjacent to the site slopes down towards the northwest. Tehama and Clementina Streets slope down towards the northeast. The elevation of the existing 235 building slab is approximately 30 feet MSL. This floor is 3 to 11 feet below the adjacent sidewalk grade along the Second Street side of the building.

A Phase I Environmental Site Assessment for the project site and a geotechnical investigation on the parking lot across Clementina Street from the project site both completed in 1998 by Treadwell & Rollo,¹ noted that the soils immediate beneath the parking lot contained approximately 10 feet of loose silty sand fill, with cinders, glass and metal debris. This fill was underlain by approximately 12 feet of moderately compressible, interbedded medium dense clayey sand and stiff sandy silt layers. Underlying these layers, predominately dense clayey sands were encountered to a total depth explored (60 feet). Groundwater was encountered was measured at approximately 41 feet below ground surface. Based on the site topography, groundwater beneath the site likely flows north-northwest.

The proposed project would adaptively reuse the existing building on Tehama and Second Streets and would extend the existing below grade parking, storage and shipping level to the property line on Clementina and Second Streets. Approximately 800 cubic yards of material would be excavated for the foundation and to level the parking garage.

The *San Francisco General Plan Community Safety Element* contains maps that show areas in the City subject to geologic hazards. The project site is located in an area subject to groundshaking from earthquakes along the San Andreas and Northern Hayward faults and other faults in the San Francisco Bay Area (See Maps 2 and 3 in the Community Safety Element). The project site also is in an area of liquefaction potential (Map 4 in the Community Safety Element), a Seismic Hazards Study Zone designated

by the California Mines and Geology. The project site is not in an area subject to landslide, seiche or tsunami run-up, or reservoir inundation hazards (Maps 5, 6, and 7 in the Community Safety Element).²

In its review of the building permit application for a development proposal in an area of liquefaction potential, the Department of Building Inspection (DBI), will require the project sponsor to prepare a geotechnical report to assess the nature and severity of the hazard(s) on the site and recommend project design and construction features that would reduce the hazard(s). To ensure compliance with all San Francisco Building Code provisions regarding structural safety, DBI will review the geotechnical report and building plans for the proposed project. Therefore, potential damage to structures from geologic hazards on the project site would be ameliorated through the DBI requirement for a geotechnical report and review of the building permit application.

Based on the above discussion, no further analysis of geography and seismicity or topography is required in the EIR.

NOTES - Geology/Topography

¹ Treadwell & Rollo, Inc., *Phase I Environmental Site Assessment, Fritz California, Second and Tehama Streets, San Francisco, California*, September 8, 1998, and *Soil Profiling and Remediation Alternatives Evaluation, Courtyard Marriot, Downtown San Francisco, Second and Folsom Streets, San Francisco, California*, March 9, 1998.

² City and County of San Francisco, *Community Safety Element, San Francisco General Plan*, April 1997.

| | <u>Yes</u> | <u>No</u> | <u>Discussed</u> |
|--|--------------------------|-------------------------------------|-------------------------------------|
| 10. <u>Water</u> - Could the project: | | | |
| a. Substantially degrade water quality, or contaminate a public water supply? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially degrade or deplete ground water resources, or interfere substantially with ground water recharge? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Cause substantial flooding, erosion or siltation? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

The project site is almost entirely covered by impervious surfaces consisting of seven buildings and paved storage, loading and parking areas. The project would demolish the existing buildings on Clementina and Second Street, adaptively reuse and expand the building on Second and Tehama Streets, resulting in a building which would cover the entire site except for an approximately 3,230-sq.-ft. plaza at the corner of Second and Clementina Streets. These site changes would not increase the area of impervious surface on

the site and would not therefore increase surface runoff. The general drainage pattern of the site would also not be altered, and site runoff would drain into the City's combined sanitary and storm drain sewer system which operates under National Pollutant Discharge Elimination System (NPDES) permits. Therefore, neither groundwater resources nor runoff and drainage would be adversely affected, nor would the project result in flooding, erosion, or siltation.

Based on groundwater measurements made for the geotechnical report for the project to the south across Clementina Street, groundwater at the site occurs at approximately 40 feet below ground surface. Construction of the project would not require dewatering.

The project is within the Eastside Reclaimed Water Use Area designated by Section 1029 of the Reclaimed Water Use Ordinance (approved November 7, 1991), which added Article 22 to Part II, Chapter X of the *San Francisco Municipal Code (Public Works Code)*. Effective 180 days from the date of this ordinance, non-residential projects over 40,000 sq.ft. that require a site permit, building permit, or other authorization, and are located within this area, shall provide for the construction and operation of a reclaimed water system for the transmission of the reclaimed water within buildings and structures. That is, the building would need to be designed with separate plumbing to service uses that could use reclaimed water (e.g. toilets).

The ordinance also requires that owners, operators, or managers of all development projects register their projects with the Water Department. The Water Department will issue a certificate of intention to use reclaimed water, and reclaimed water shall be used unless the Water Department issues a certificate exempting compliance because reclaimed water is not available, an alternative water supply is to be used, or the sponsor has shown that the use of reclaimed water is not appropriate. In light of above, the project would not result in a significant effect related to water, and no further analysis of water resources is required in the EIR.

| | <u>Yes</u> | <u>No</u> | <u>Discussed</u> |
|--|--------------------------|-------------------------------------|-------------------------------------|
| 11. <u>Energy/Natural Resources</u> - Could the project: | | | |
| a. Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Have a substantial effect on the potential use, extraction, or depletion of a natural resource? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

New buildings in San Francisco are required to conform to energy conservation standards specified by Title 24 of the California Code of Regulations. Documentation showing compliance with these standards is submitted with the application for the building permit. Title 24 is enforced by the Department of Building Inspection; and thus, no further analysis of energy is required in the EIR.

| | <u>Yes</u> | <u>No</u> | <u>Discussed</u> |
|---|--------------------------|-------------------------------------|-------------------------------------|
| 12. <u>Hazards</u> - Could the project: | | | |
| a. Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Interfere with emergency response plans or emergency evacuation plans? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Create a potentially substantial fire hazard? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

A Phase I Environmental Site Assessment (ESA) was prepared for the project site by Treadwell & Rollo, Inc. in September 1998 (a copy of this report is available for review in Project File No. 99.176E at the Planning Department, 1660 Mission Street, San Francisco). The report described the land use history of the project site and area that may have involved handling, storage, or disposal of hazardous substances that could have affected the quality of soils or groundwater, and evaluated the potential presence of chemically-affected soil on the project site.

The 1887 and 1899 Sanborn Maps indicate that the site was occupied by a hotel and commercial property on Second Street. The 1913 map shows that a plumbing warehouse existed on Tehama Street and a machine shop and residence were on Clementina Street. By 1949, the site was occupied by a paint warehouse, a brass foundry, and a machine shop. From 1970 to 1980, a garment factory, machine shop and brass foundry were on the site. The site was purchased by the present tenant in 1981 and used for garment storage, packaging and shipment.

The site is not listed in the State of California Hazardous Waste and Substances List (Cortese List), nor on other Standard Environmental Record source lists. There is a history of industrial use that likely involved the use of petroleum hydrocarbons. The San Francisco Fire Department files had no record of past use of petroleum hydrocarbons and hazardous materials at the site. However, because of past site uses, several issues of potential concern are discussed below.

Asbestos

The Phase I ESA suggested that friable asbestos-containing building materials (ACBM) likely exist in the PG&E gas meter room on the first floor of the building adjacent to Tehama Street. The friable ACBM should be removed in accordance with Bay Area Air Quality Management District (BAAQMD), California Occupational Safety and Health Administration (CAL-OSHA), and California Department of Health Services (DHS) requirements. Prior to conducting any renovation or construction activities that would disturb friable ACBM (including potentially friable ACBM and non-friable ACBM that could be rendered friable by the proposed activities), the ACBM should be abated.

Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The Bay Area Air Quality Management District is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or asbestos abatement work. The notification must include the names and addresses of the operations and the names and addresses of persons responsible; location and description of the structure to be demolished/altered, including size, age, and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or asbestos abatement work; nature of the planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The District randomly inspects asbestos removal operations. In addition, the District will inspect any removal operation about which a complaint has been received. Any ACBM disturbance at the project site would be subject to the requirements of District Regulation 11, Rule 2: Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing.

The local office of the State Occupational Safety and Health Administration must also be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow State regulations contained in 8CCR1529 and 8CCR341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of asbestos containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material is required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Pursuant to California Law, the Department of Building Inspection would not issue the required permit until the applicant has complied with the notice requirements described above.

These regulations and procedures, already established as part of the permit review process, would ensure that any potential impacts due to asbestos would be reduced to a level of non-significance. Therefore, no further mitigation is required.

Lead-Based Paint

The Phase I ESA did not include testing for lead based paint. If lead-based paint is on the existing building to be demolished, the demolition of buildings containing lead-based paint must be conducted in compliance with Chapter 36 of the *San Francisco Building Code*, (Work Practices for Exterior Lead-Based Paint). Where there is any work that may disturb or remove lead paint on the exterior of any building built prior to December 31, 1978, Chapter 36 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Chapter 36 applies to buildings or steel structures on which original construction was completed prior to 1979 (which are assumed to have lead-based paint on their surfaces), where more than ten total square feet of lead-based paint would be disturbed or removed. The Ordinance contains performance standards, including establishment of containment barriers at least as effective at protecting human health and the environment as those in the most recent *Guidelines for Evaluation and Control of Lead-Based Paint Hazards* promulgated by the U.S. Department of Housing and Urban Development, and identifies prohibited practices in disturbance or removal of lead-based paint. Any person performing work subject to the Ordinance shall make all reasonable efforts to prevent migration of lead-based paint contaminants beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

The Ordinance also includes notification requirements, contents of notice, and requirements for signs. Notification includes notifying bidders for the work of any paint-inspection reports verifying the presence or absence of lead-based paint in the regulated area of the proposed project. Prior to commencement of work, the responsible party must provide written notice to the Director of the Department of Building Inspection, of the location of the project; the nature and approximate square footage of the painted surface being disturbed and/or removed; anticipated job start and completion dates for the work; whether the building is residential or nonresidential, owner-occupied or rental property, approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. There are other notice requirements in addition to those listed above. The Ordinance

contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance with the requirements of the Ordinance.

These regulations and procedures, already established as part of the building permit review process, would ensure that potential impacts of the proposed project due to the presence of lead-based paint would be reduced to a level of insignificance. Therefore, no further mitigation is required.

Soil and Groundwater

The Phase I ESA noted that the project site is likely to be underlain by fill similar to the parking lot across Clementina Street. Elevated metals and petroleum hydrocarbon concentrations are commonly found in fill areas of San Francisco. The sources of these compounds typically result from past regional industrial activities and the 1906 earthquake and fire debris. The presence of fill with elevated metals and petroleum hydrocarbons does not necessarily prompt a response from regulatory agencies because of the regional nature of the problem. Approximately 800 cubic yards of fill would be removed for site development, and Mitigation Measure 2a on page 38, would ensure that effects of contamination are reduced to a less-than-significant level.

Other Potential Hazardous Materials

Other potential hazardous building materials such as PCB-containing electrical equipment could pose health threats for demolition workers but would be mitigated by standard building surveys and abatement measures (see Mitigation Measure 2b, page 38).

Emergency Response

San Francisco ensures fire safety primarily through provisions of the Building Code and the Fire Code. The final building plans for any new or modified office building project is reviewed by the San Francisco Fire Department (as well as the Department of Building Inspection) in order to ensure conformance with these provisions. The proposed project would conform to these standards, which would include sprinkler systems throughout the building. In this way, potential fire hazards (including those associated with hydrant water pressure and emergency access) would be mitigated during the permit review process.

Potential health and safety issues related to building contamination, soil contamination, future use of hazardous materials on site, and emergency procedures and remediation would be reduced to less-than-significant levels, with implementation of the mitigation measures included in the project development. Therefore, these issues do not require further analysis and will not be discussed in the EIR.

Yes No Discussed

13. Cultural - Could the project:

- | | | | |
|---|--------------------------|-------------------------------------|-------------------------------------|
| a. Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community, ethnic or social group; or a paleontological site except as a part of a scientific study? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with established recreational, educational, religious or scientific uses of the area? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Conflict with the preservation of buildings subject to the provisions of Article 10 or (proposed) Article 11 of the City Planning Code? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |

A cultural resources evaluation of the project site was completed by an independent consultant and is summarized here.¹ In its natural state, the project site was situated on one of the many undulating sand hills that characterized most of San Francisco's original topography. These site hills were probably covered with the same varieties of vegetation found throughout most of the northern San Francisco peninsula, mainly grasses, scrub brush, and occasional stands of willows and oak trees. Elevations of the site ranged between approximately 25 and 35 feet above mean sea level. The original shoreline of San Francisco Bay was located approximately 650-820 feet east of the project site, near the present-day intersection of Folsom and Fremont Streets.

The project site is situated in what was, prior to the arrival of the first Europeans, the northwestern portion of the territory occupied by the Costanoan people, a Native American group also referred to in anthropological literature as the Ohlone. The marshes of Mission Bay and the shoreline of Yerba Buena Cove were situated in proximity to the project site. Previous research has shown that such environments may have represented favorable sites for a Native American settlement. Several deeply buried, previously unrecorded prehistoric sites have been recently discovered in the South of Market area, within a half-mile radius of the project site. An assessment of the characteristics of these archaeological sites and their proximity to the shoreline of Yerba Buena Cove and the marshes bordering Mission Bay suggests that similar prehistoric/protohistoric (up to 1775 A.D.) archaeological deposits may exist within or adjacent to the proposed project site.

It is unlikely that there was any regular activity on the project site or its immediate vicinity during the Spanish, Mexican Periods or Early American eras (1776-1848). The Mission Dolores and the Presidio, the

principal centers of activity, were located at a considerable distance from the site, and the gradual growth of the settlement of Yerba Buena (later renamed San Francisco) did not encroach upon the project site. Throughout the entirety of the Early Historic Period, the project area remained in a completely natural state.

The first settlement and development of the South of Market area in which the project site is located began during the Gold Rush era (1849 -1857). After serving as a jumping-off point for prospectors waiting to travel to the Sierra gold fields, the area was initially developed with dozens of iron foundries and heavy machinery manufacturers. The first record of a land transaction on the project site occurred as early as 1847 where portions of the western edge had been purchased and subdivided, however little grading or other topographic modifications. By 1857, approximately one dozen wood frame structures had been constructed on the project site. The Second Street frontage was occupied by two and three-story frame buildings containing retail business establishments of various sorts on the ground floor and residential accommodations above.

During the early and mid-1850s the development of the South of Market area galloped ahead. Directly to the south of the project area, on Second Street between Folsom and Harrison Streets, stood a number of large, elegant residences that became home to some of the City's leading citizens. The Folsom Street and Second Street frontages near the project site were developed with the residences of wealthy professionals, merchants, and businessmen.

During the later 19th Century Period (1858-1906), the topography in the South of Market area was drastically altered, with all of the region's great sand hills systematically reduced over a period of about 20 years. The material excavated from the hillsides was used to fill in the waters of Yerba Buena Cove and Mission Bay, extending the City's shoreline eastward by up to 1,000 feet. The alteration of topography included the infamous Second Street cut of 1869.

By the 1880s, nearly all of the elegant two- and three-story buildings that had been situated in the area prior to the Second Street cut were gone. In their place were one- and two-story frame structures containing multi-family residences and boarding houses. The Second Street frontage on the project site was filled with five multi-story buildings containing two hotels and at least three saloons. The Montgomery Hotel, the largest of these structures, was located at the southeastern corner of the Second and Tehama Streets.

The buildings on the project site were consumed by fire in the great 1906 earthquake. Although some portions of the City were rebuilt with amazing rapidity, rebuilding on the project site and block was very slow to occur. By 1913, only a few buildings were known to exist on the project block. During the second

decade of the 20th Century, the remainder of the present project area was devoted to a mixture of commercial and residential use. By the early 1930s, the project site and environs had been developed with the essential land use mix and architectural characteristics that typify the current neighborhood.

In summary, while there is a potential for encountering prehistoric/protohistoric archaeological resources at the site, no concrete evidence of such cultural materials was discovered in the cultural resources evaluation of the project. There is little likelihood of recovering cultural resources from the Spanish, Mexican or Early American periods (1775-1848). However, there is reasonable possibility that subsurface cultural resources of significance associated with the Gold Rush and Late 19th Century periods may exist within the confines of the project site.

Construction of the project would require about 800 cubic yards of fill to be removed. The importance of any uncovered artifacts would be determined on a case-by-case basis. With implementation of Mitigation Measure 3, page 38, the project's potential impact on subsurface cultural resources would be reduced to a level of insignificance. Archaeological resources, therefore, require no further analysis and will not be included in the EIR.

The proposed project's potential to affect historic and architectural resources of significance would be limited to its potential effect on adjacent properties. Buildings in the immediate vicinity of the project site were surveyed between 1974 and 1976 as part of a City-sponsored inventory of architecturally significant buildings. The inventory assessed the architectural significance of 10,000 surveyed structures from the standpoint of overall design and particular design features. Both contemporary and older buildings were included and each building was numerically rated according to its overall architectural significance. The ratings ranged from a low of "0" to a high of "5". Factors considered included architectural significance, urban design context, and overall environmental significance. No building adjacent to the project site was listed in the 1976 Citywide Architectural Survey. Further, no building near the project site is designated as a City landmark, listed on the National Register of Historic Places, or subject to the provisions of Article 10 (Preservation of Historical, Architectural and Aesthetic Landmarks) or Article 11 (Preservation of Buildings and Districts of Architectural, Historical and Aesthetic Importance in the C-3 Districts) of the Planning Code. The proposed project, including the renovation of existing buildings would not have any visual impact on the architectural, historical, or cultural significance of buildings in the area.

Notes - Cultural Resources

- ¹ Allen G. Pastron, PhD., *Archival Cultural Resources Evaluation of the Proposed 235 Second Street Project, San Francisco, California*, June 1999. This report is available for public review in Project File No. 99.176E at the Planning Department, 1660 Mission Street, San Francisco, CA.

Yes No Discussed

C. OTHER

Require approval and/or permits from City Departments other than the Planning Department or Department of Building Inspection or from Regional, State or Federal Agencies?

☐ ☒ ☒

As discussed above, in addition to building permits from the Department of Building Inspection, the proposed project would require Section 309 Permit Review and project authorization under Section 321 for office development. Prior to authorizing the proposed project, the Planning Commission is required to find that the proposed project is consistent with the Priority Policies listed in Section 101.1 of the *Planning Code* (Proposition M).

D. MITIGATION MEASURES PROPOSED AS PART OF THE PROJECT:

Yes No N/A Discussed

1. Could the project have significant effect if mitigation measures are not included in the project?

☒ ☐ ☐ ☒

2. Are all mitigation measures necessary to eliminate significant effects included in the project?

To Be Determined

The following mitigation measures are related to topics determined to require no further analysis in the EIR. The EIR will contain a mitigation chapter describing these measures and also include other measures which would be, or could be, adopted to reduce potential adverse effects of the project identified in the EIR.

The project sponsor has agreed to implement the following:

1. Construction Air Quality: The project sponsor shall require the construction contractor(s) to spray the project site with water during excavation, grading, and site preparation activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other such material; cover trucks hauling debris, soils, sand or other such material; and sweep surrounding streets during these periods at

least once per day to reduce particulate emissions. Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor shall require the construction contractor(s) to obtain reclaimed water from the Clean Water Program for this purpose.

The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as prohibiting idling motors when equipment is not in use or when trucks are waiting in queues, and implementing specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

2. Hazards:

- a. The project sponsor would ensure that the construction contractor limit the amount of excavation, and handle and dispose of any excavated soils properly. Soil excavated for offsite disposal or use shall be characterized for metals and petroleum hydrocarbons based on the requirements of the accepting facility or party; this characterization should be performed on a representative volume of stockpiled soil.
- b. The project sponsor would ensure that building surveys for asbestos, PCB-containing equipment (including elevator equipment), hydraulic oils, fluorescent lights, and lead-based paint are performed prior to the start of demolition. Any hazardous materials so discovered would be abated according to federal, state, and local laws and regulations.

3. Cultural Resources: Should evidence of archaeological resources of potential significance be found during ground disturbance, the project sponsor would immediately notify the Environmental Review Officer (ERO), and would suspend any excavation which the ERO determined could damage such archaeological resources. Excavation or construction activities which might damage cultural resources would be suspended for a total maximum of four weeks over the course of construction.

After notifying the ERO, the project sponsor would select an archaeologist to assist the Office of Major Environmental Analysis in determining the significance of the find. The archaeologist would prepare a draft report containing an assessment of the potential significance of the find and recommendations for what measure should be implemented to minimize the potential effects on archaeological resources. Based on this report, the ERO would recommend specific mitigation measures to be implemented by the project sponsor.

Mitigation measures might include a site security program, additional on-site investigations by the archaeologist, and/or documentation, preservation, and recovery of the cultural material. Finally, the archaeologist would prepare a report documenting the cultural resources that were discovered, an evaluation as to their significance, and a description as to how any archaeological testing, exploration and/or recovery program was conducted.

Copies of all draft reports prepared according to this mitigation measure would be sent first and directly to the ERO for review. Following approval by the ERO, copies of the final report would be sent to the President of the Landmarks Preservation Advisory Board and the California Archaeological Site Survey Northwest Information Center. The Office of Major Environmental Analysis shall receive three copies of the final archaeological report.

E. ALTERNATIVES

Alternatives to the proposed project will be defined further and described in the EIR. At a minimum, alternatives analyzed will include the following:

1. A No Project Alternative, in which the site would remain in its existing condition.
2. A lesser development alternative in which less office use on the site would be proposed.

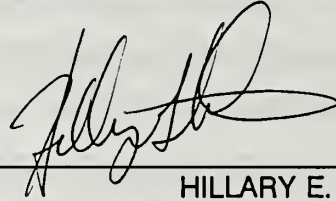
F. MANDATORY FINDINGS OF SIGNIFICANCE

| | <u>Yes</u> | <u>No</u> | <u>Discussed</u> |
|--|--------------------------|-------------------------------------|-------------------------------------|
| 1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or pre-history? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| 2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Does the project have possible environmental effects which are individually limited, but cumulatively considerable? (Analyze in the light of past projects, other current projects, and probable future projects.) | To Be Determined | | |
| 4. Would the project cause substantial adverse effects on human beings, either directly or indirectly? | To Be Determined | | |

The project would add approximately 300,000 square feet of office space, and would have transportation and related impacts that could be potentially significant. The EIR will consider and evaluate these issues and impacts.

G. ON THE BASIS OF THIS INITIAL STUDY

- ☐ I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.
- ☐ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures, numbers 1, 2, and 3, in the discussion have been included as part of the proposed project. A NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.



HILLARY E. GITEMAN
Environmental Review Officer
for
Gerald G. Green
Director of Planning

Date: 7/10/99

APPENDIX B: DRAFT EIR DISTRIBUTION LIST

A. DRAFT EIR DISTRIBUTION LIST

FEDERAL AND STATE AGENCIES

California Dept. of Transportation
Office of Transportation Planning-B
P.O. Box 23660
Oakland, CA 94623-0660
Attn: Nandini N Shridhar

Northwest Information Center
Dept. of Anthropology
Sonoma State University
Rohnert Park, CA 94928
Attn: Christian Gerike

State Office of Intergovernmental Mgmt.
State Clearinghouse
P.O. Box 3044
Sacramento, CA 95812-3044

Daniel Abeyta
Acting State Historic Preservation Officer
Office of Historic Preservation
CA Dept. of Parks and Recreation
P.O. Box 942896
Sacramento, CA 94296-0001

REGIONAL AGENCIES

Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604-2050
Attn: Susan Ryder

Association of Bay Area Governments
101 8th Street
Oakland, CA 94607
Attn: Jean Pederson

Regional Water Quality Control Board, SF
Bay Region
1515 Clay St., Ste. 1400
Oakland, CA 94612
Attn: Judy Huang

Craig Goldblatt
Metropolitan Transportation Commission
101 Eighth St.
Oakland, CA 94607

Bay Area Air Quality Management
District
939 Ellis Street
San Francisco, CA 94109
Attn: Joseph Steinberger

Kenneth C. Scheidig
General Counsel
AC Transit
1600 Franklin St.
Oakland, CA 94612

Jerome Kuykendall
Director of Planning and Policy Analysis
GGBHTD
1011 Anderson Dr.
San Rafael, CA 94901

Environmental Compliance Manager
BART - (IBB-17)
800 Madison St.
Oakland, CA 94607

CITY AND COUNTY OF SAN FRANCISCO

Landmarks Preservation Advisory Board
1660 Mission St., 5th Flr.
San Francisco, CA 94103
Attn: Daniel Reidy, President

San Francisco Planning Commission
1660 Mission St.
San Francisco, CA 94103
Anita Theoharis, President
Beverly Mills, Vice President
Linda Richardson
Lawrence B. Martin
Dennis A Antenore
Cynthia Joe
Hector Chinchilla
Linda Avery, Secretary

Department of Building Inspection
1660 Mission Street
San Francisco, CA 94103
Attn: Frank Chiu, Director

Mayor's Office of Community Development
25 Van Ness Ave., Suite 700
San Francisco, CA 94102
Attn: Pamela David, Director

Marcia Rosen, Director
Mayor's Office of Housing
25 Van Ness Ave. # 600
San Francisco, CA 94102

Bureau of Energy Conservation
Hetch Hetchy Water & Power
1155 Market Street, 4th Floor
San Francisco, CA 94103
Attn: John Deakin, Director

Maria Ayerdi
Mayor's Office of Economic Development
City Hall, Room 448
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4689

Public Utilities Commission
1155 Market Street
San Francisco, CA 94102
Attn: Anson B. Moran, General Manager

Police Department
Planning Division Hall of Justice
850 Bryant Street, Room 500
San Francisco, CA 94103
Attn: Capt. Timothy Hettrich

San Francisco Department of Public Works
Bureau of Street Use & Mapping
875 Stevenson Street, Room 465
San Francisco, CA 94103
Attn: Barbara Moy

San Francisco Department of Parking & Traffic
Traffic Engineering Division
25 Van Ness Avenue
San Francisco, CA 94102
Attn: Bond M. Yee

San Francisco Fire Department
Division of Planning & Research
698 Second Street
San Francisco, CA 94107
Attn: Lorrie Kalos, Asst. Deputy Chief

San Francisco Municipal Railway
MUNI Planning Division
949 Presidio Avenue, Room 204
San Francisco, CA 94115
Attn: Peter Straus

Recreation & Park Department
McLaren Lodge, Golden Gate Park
Fell and Stanyan Streets
San Francisco, CA 94117
Attn: Deborah Learner

San Francisco Real Estate Department
25 Van Ness Avenue, 4th floor
San Francisco, CA 94102
Attn: Anthony Delucchi, Director of Property

MEDIA

Associated Press
1390 Market Street, Suite 318
San Francisco, CA 94102
Attn: Bill Shiffman

Leland S. Meyerzone
KPOO - FM
P.O. Box 6149
San Francisco, CA 94101

San Francisco Bay Guardian
520 Hampshire St.
San Francisco, CA 94110
Attn: Gabe Roth, City Editor

San Francisco Business Times
275 Battery Street
Suite 940
San Francisco, CA 94111
Attn: Tim Turner

San Francisco Chronicle
925 Mission Street
San Francisco, CA 94103
Attn: Elliot Diringer

San Francisco Examiner
P.O. Box 7260
San Francisco, CA 94120
Attn: Gerald Adams

The Sun Reporter
1366 Turk Street
San Francisco, CA 94115

Tenderloin Times
146 Leavenworth Street
San Francisco, CA 94102
Attn: Rob Waters

San Francisco Independent
1201 Evans Avenue
San Francisco, CA 94124

LIBRARIES

Stanford University Libraries
Jonsson Library of Government
Documents
State & Local Documents Division
Stanford, CA 94305

Government Publications Department
San Francisco State University
1630 Holloway Avenue
San Francisco, CA 94132

Hastings College of the Law - Library
200 McAllister Street
San Francisco, CA 94102-4978

Institute of Government Studies
109 Moses Hall
University of California
Berkeley, CA 94720

Kate Wingerson (3 copies)
Document Library
City Library - Civic Ctr.
San Francisco, CA 94102

PROJECT SPONSOR

235 Second Street, LLC
1475 Folsom Street
Suite 400
San Francisco, CA 94103
Rob Birmingham, President

PROJECT ATTORNEYS

Law Offices of David Cincotta
1388 Sutter Street
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San Francisco, CA 94109
David P. Cincotta
Susanne Beilicke

PROJECT ARCHITECT

Fee Munson Ebert
500 Montgomery Street
San Francisco, CA 94111
Christiann Maarse, Principal

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360 Fourth Street
San Francisco, CA 94107

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Executive Director
American Institute of Architects
130 Sutter Street, Suite 600
San Francisco, CA 94104

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Economic Opportunity Council Dist.
759A Minna St.
San Francisco, CA 94103

Florentino Ramirez
Filipino-Am. SOMAR Neigh. Assn.
543-A Natoma Street
San Francisco, CA 94103

Coordinator
Yerba Buena & So. Mkt Consortium
109 Minna Street, Ste. 575
San Francisco, CA 94105

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Executive Director
Market Street Assoc.
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San Francisco, CA 94102

Gemmie Jones
Director
Senior Central
360 Fourth Street
San Francisco, CA 94107

Wesley Seeds
SOMAR Res. Artists & Merch. Assn.
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San Francisco, CA 94103

Jim West
President
South of Market Neighborhood Assn
737 Folsom Street #314
San Francisco, CA 94107

York Loo
York Realty
243A Shipley Street
San Francisco, CA 94107-1010

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Development Director
Capp Street Project
525 Second Street
San Francisco, CA 94107

Tse Ming Tam
Assistant Director
Chinese for Affirmative Action
17 Walter U. Lum Place
San Francisco, CA 94108

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So. of Market Problem Solving Council
965 Mission Street, Ste. 700
San Francisco, CA 94103

Sue Hestor
870 Market Street #1121
San Francisco, CA 94102

Jack Davis
c/o Arthouse
595 Market Street #2200
San Francisco, CA 94105

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TODCO
230 4TH St.
San Francisco, CA 94103

Jose Campos
SF Redevelopment Agency
770 Golden Gate
San Francisco, CA 94102

Calvin Welch
409 Clayton St.
San Francisco, CA 94117

Jim Berk
SOMPAC Land Use Committee
P.O. Box 77068
San Francisco, CA 94103

Brad Urie
Marriott
3130 South Harbor Blvd.
Ste. 340
Santa Anna, CA 92704

Georgia Brittan
San Franciscans for Reasonable Growth
460 Duncan Street
San Francisco, CA 94131

**B. DRAFT EIR NOTIFICATION
DISTRIBUTION LIST**

**ADJACENT PROPERTY OWNERS &
TENANTS**

Marine Firemens Union
240 2nd St.
San Francisco, CA 94105-3129

222 Second St.
8705 SW Nimbus Ave. #115
Beaverton, OR 97008-4037

Fritzi Realty
199 1st St.
San Francisco, CA 94105-2626

Evelyn Harbold Trustee
923 Shoreline Dr.
San Mateo, CA 94404-2051

William Duval
72 Tehama St.
San Francisco, CA 94105

Birkenseer Trust
575 Howard St.
San Francisco, CA 94105

Edward Zak
80 Tehama St.
San Francisco, CA 94105

Rosemarie Vonhacht Grantz
1006 Creston Rd.
Berkeley, CA 94708

Anthony Hay
P.O. Box 330018
San Francisco, CA 94133

585 Howard Street Partners
35 Stillman St. #300
San Francisco, CA 94107-1364

Occupant
64 Clementina St.
San Francisco, CA 94105

Occupant
74 Tehama St.
San Francisco, CA 94105

Occupant
90 Tehama St.
San Francisco, CA 94105

Occupant
217 2nd St. #M1
San Francisco, CA 94105

Occupant
217 2nd St. #201
San Francisco, CA 94105

Occupant
217 2nd St. #202
San Francisco, CA 94105

Occupant
217 2nd St. #300
San Francisco, CA 94105

Occupant
217 2nd St. #301
San Francisco, CA 94105

Occupant
219 2nd St.
San Francisco, CA 94105

Occupant
220 2nd St.
San Francisco, CA 94105

Occupant
221 2nd St.
San Francisco, CA 94105

Occupant
222 2nd St.
San Francisco, CA 94105

Occupant
223 2nd St.
San Francisco, CA 94105

Occupant
235 Second St.
San Francisco, CA 94105-3124

Occupant
585 Howard St. LL-1
San Francisco, CA 94105

Occupant
585 Howard St. LL-2
San Francisco, CA 94105

Occupant
585 Howard St. 1st. Flr.
San Francisco, CA 94105

Occupant
585 Howard St. 2nd Flr.
San Francisco, CA 94105

Occupant
585 Howard St. 3rd Flr.
San Francisco, CA 94105

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San Francisco, CA 94108

Civic Pride
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The Ferry Building
San Francisco, CA 94111
ATTENTION: Jim Haas

Farella, Braun & Martel
235 Montgomery Street
San Francisco, CA 94104
Attn: Mary Murphy

Richard Mayer
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APPENDIX C: INTERSECTION LEVEL OF SERVICE DESIGNATIONS

Existing and future traffic conditions at signalized intersections within the primary study area have been evaluated using the TRAF-NETSIM Traffic Simulation Model. Conditions at signalized intersections in the secondary study area have been evaluated using the *1985 Highway Capacity Manual* (Transportation Research Board, 1985) operations methodology. Both methodologies use the concept of Level of Service (LOS), which, for signalized intersections, is defined in terms of delay, or waiting time at a signal. Delay is a measure of driver discomfort, frustration, fuel consumption, and lost travel time. Intersection LOS, determined according to the vehicle delay in seconds per vehicle, range from LOS A (very low delay) to LOS F (forced flow). Table C-1 (page A.46) provides more detailed descriptions of the six LOS, A through F, for signalized intersections using the *1985 Highway Capacity Manual* method. The TRAF-NETSIM simulation calculates LOS in much the same way, with similar results, but refines the analysis based on signal progression along streets, such as the Embarcadero, and based on spill-back, when queues from one intersection extend back to a previous intersection.

In the past, for planning applications, the City of San Francisco has used a slightly different methodology than the TRAF-NETSIM or *1985 Highway Capacity Manual* to analyze operations at signalized intersections. That method, known as the *Critical Lane Analysis* (Transportation Research Circular Number 212, Transportation Research Board, 1980), determines the ratio of critical opposing traffic volumes to theoretical intersection capacity, yielding the volume-to-capacity (v/c) ratio. Intersection LOS, determined according to the value of the v/c ratio, range from LOS A (free flowing condition) to LOS F (severely congested conditions). Table C-2 (page A.47) provides more detailed descriptions of the six LOS, A through F, for signalized intersections using the *Critical Lane Analysis* methodology.

TABLE C-1
SIGNALIZED INTERSECTION LEVEL OF SERVICE DEFINITIONS BASED ON DELAY

| LEVEL OF SERVICE | TYPICAL DELAY (SEC/VEH) | TYPICAL TRAFFIC CONDITION |
|------------------|-------------------------|--|
| A | ≤ 5.0 | Insignificant Delays: No approach phase is fully utilized and no vehicle waits longer than one red indication. |
| B | 5.1 - 15.0 | Minimal Delays: an occasional approach phase is fully utilized. Drivers begin to feel restricted. |
| C | 15.1 - 25.0 | Acceptable Delays: Major approach phase may become fully utilized. Most drivers feel somewhat restricted. |
| D | 25.1 - 40.0 | Tolerable Delays: Drivers may wait through more than one red indication. Queues may develop but dissipate rapidly, without excessive delays. |
| E | 40.1 - 60.0 | Significant Delays: Conditions are generally the limit of acceptable delays. Vehicles may wait through several signal cycles and long queues of vehicles from upstream. |
| F | > 60.0 | Excessive Delays: Represents unacceptable conditions with extremely long delays. Queues may block upstream intersections. |

Sources: *Highway Capacity Manual*, Highway Research Board, Special Report No. 209, Washington, D.C., 1985; *Interim Materials on Highway Capacity*, Circular 212, Transportation Research Board, 1980; Korve Engineering.

TABLE C-2
ARTERIAL LEVEL OF SERVICE DEFINITIONS BASED ON TRAVEL SPEED

| ARTERIAL CLASS | I | II | III |
|---------------------------------|----------------------------|-----------|-----------|
| RANGE OF FREE FLOW SPEEDS (mph) | 45 to 35 | 35 to 30 | 35 to 25 |
| TYPICAL FREE FLOW SPEED (mph) | 40 | 35 | 27 |
| LEVEL OF SERVICE | AVERAGE TRAVEL SPEED (mph) | | |
| A | ≥ 35 | ≥ 30 | ≥ 25 |
| B | ≥ 28 | ≥ 24 | ≥ 19 |
| C | ≥ 22 | ≥ 18 | ≥ 13 |
| D | ≥ 17 | ≥ 14 | ≥ 9 |
| E | ≥ 13 | ≥ 10 | ≥ 7 |
| F | < 13 | < 10 | < 7 |

| | |
|---------------------|---|
| Level of Service A: | Primarily free-flow operations at average travel speeds, usually about 90 percent of the free flow speed for the arterial class. Vehicles are completely unimpeded in their ability to maneuver within the traffic stream. Stopped delay at signalized intersections is minimal. |
| Level of Service B: | Reasonably unimpeded operations at average travel speeds, usually about 70 percent of the free flow speed for the arterial class. The ability to maneuver within the traffic stream is only slightly restricted and stopped delays are not bothersome. Drivers are not generally subjected to appreciable tension. |
| Level of Service C: | Stable operations. However, ability to maneuver and change lanes in mid-block locations may be more restricted than in LOS B, and longer queues and/or adverse signal coordination may contribute to lower average travel speeds of about 50 percent of the average free flow speed for the arterial class. Motorists will experience an appreciable tension while driving. |
| Level of Service D: | Borders on a range on which small increases in flow may cause substantial increases in approach delay and, hence, decreases in arterial speed. This may be due to adverse signal progression, inappropriate signal timing, high volumes, or some combination of these. Average travel speeds are about 40 percent of free flow speed. |
| Level of Service E: | Significant approach delays and average travel speeds of one-third the free flow speed or lower. Such operations are caused by some combination of adverse progression, high signal density, extensive queuing at critical intersections, and inappropriate signal timing. |
| Level of Service F: | Extremely low speeds below one-third to one-quarter of the free flow speed. Intersection congestion is likely at critical signalized locations, with high approach delays resulting. Adverse progression is frequently a contributor to this condition. |

Source: Highway Capacity Manual, Special Report 209, Transportation Research Board, 1980.

Although the two methodologies for calculating the LOS differ, there is usually a good correlation between the LOS calculated using either method of analysis. It is only when high levels of congestion occur that differences between the two methodologies may be more apparent. As an example, using the *1985 Highway Capacity Manual* methodology, an intersection may be operating at a LOS F, with poor traffic progression, many signal cycle failures and vehicle delays above 60 seconds per vehicle; however, the v/c ratio could be below one, which would mean a LOS E using the *Critical Lane Analysis* methodology. Conversely, using the *1985 Highway Capacity Manual* methodology, an intersection may be operating at LOS D, with an efficient signal progression handling large traffic volumes; however, the v/c ratio could be above 0.9, which would mean a LOS E using the *Critical Lane Analysis* methodology.

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